



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LR-8J

FEB 04 2011

CERTIFIED MAIL 7009 1680 0000 7665 4227
RETURN RECEIPT REQUESTED

Tom Lisota
Parts Cleaning Technologies
Detrex Corporation
2537 LeMoyne Avenue
Melrose Park, Illinois 60160

Re: Compliance Evaluation Inspection
EPA I.D. No.: ILD 074 424 938

Dear Mr. Lisota:

On January 10, 2011, a representative of the U.S. Environmental Protection Agency inspected the permitted facility owned by Detrex Corporation and operated by Parts Cleaning Technologies (the facility) located in Melrose Park, Illinois. The purpose of the inspection was to evaluate the Facility's compliance with their October 9, 2003 Hazardous Waste Management Permit (Permit) that was modified on December 2, 2010. Please find enclosed a copy of the inspection report for your reference.

As of this writing, based upon information available to EPA, our review of the inspection has not resulted in the detection of violations of any of the specific Permit requirements under evaluation. This determination does not limit the applicability of the Permit requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. EPA and the Illinois Environmental Protection Agency will continue to evaluate your facility in the future.

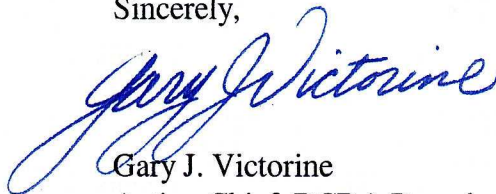
US EPA RECORDS CENTER REGION 5



1000547

If you have any questions or concerns regarding this letter, please contact Diane Sharrow, of my staff, at (312) 886-6199.

Sincerely,



Gary J. Victorine
Acting Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: David Craig, Detrex Corporation (w/enclosure)

Todd Marvel, Illinois Environmental Protection Agency (w/enclosure)

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1. Article Addressed to:

Tam Lisota
Parts Cleaning Technologies
Detrex Corporation
2537 LeMayne Avenue
Melrose Park, IL 60160

2. Article Number

7009 1680 0000 7665 4227

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Diane Sharrow
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Chicago, IL 60604

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Tom Lisota

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or PO Box No.

2537 Le Mayne Avenue

City, State, ZIP+4

Melrose Park, Illinois 60160

PS Form 3800, August 2006

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Detrex Corporation (Parts Cleaning Technologies)

U.S. EPA ID. No.: ILD 047 424 938

LOCATION ADDRESS: 2537 LeMoyne Avenue, Melrose Park, Illinois 60160

NAICS CODE: 61131

DATE OF INSPECTION: January 11, 2011

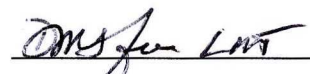
U.S. EPA INSPECTOR: Diane M. Sharrow

PREPARED BY:


Diane M. Sharrow
Senior Inspector/Environmental Scientist

01-28-11
Date

REVIEWED BY:


Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch

1-28-11
Date

Purpose of Inspection

The purpose of the inspection was to conduct a compliance evaluation inspection (CEI) at Detrex Corporation (Detrex). Detrex is located at 2537 LeMoyne Avenue, Melrose Park, Illinois 60160. The CEI was conducted to evaluate Detrex's compliance with their October 9, 2003, Hazardous Waste Management Permit (Permit).

Background

A CEI to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically those regulations related to the management of hazardous waste, was last conducted at this location by the Illinois Environmental Protection Agency (Illinois EPA) on December 18, 2008. Illinois EPA also conducted a Financial Record Review of Detrex on February 16, 2010.

Detrex notified U.S. EPA of its hazardous waste activities on or about July 11, 1980, and subsequently filed both the Part A and Part B portions of a RCRA hazardous waste permit application. Detrex is currently the owner of the storage facility, and Parts Cleaning Technologies staffs the facility for Detrex. Detrex is currently a permitted storage facility and operating under a Hazardous Waste Management Permit issued by the Illinois EPA that has an effective date of October 9, 2003.

Detrex has submitted to Illinois EPA a Phase II Investigative Summary, a Tier I Screening Evaluation and a Tier 2 TACO Analysis for evaluation of corrective action necessary at the facility. A Class 2 Modification to Detrex's Hazardous Waste Permit was made by Illinois EPA effective December 2, 2010, to allow the addition of a loading dock area on the east side (Photograph 2) of the building so remediation can be conducted in the area of the existing loading dock (Photographs 4 and 5) located on the south side of the building.

Plant Description and Process

Detrex is a hazardous waste storage facility that receives solid and hazards waste from various off-site generators. Hazardous wastes received by Detrex include spent solvent wastes, solids, liquids and sludge in containers, as well as halogenated organic hazardous waste, including wastes with the waste codes F001, F002, U codes, and D Codes under the TCLP. Detrex primarily stores containers of contaminated solvent prior to transfer to an off-site reclamation or recycling facility, or to an off-site permitted TSD facility. Detrex is located in a stand-alone building in an industrial park setting.

Detrex no longer transports solid and hazardous waste. Transportation of solid and hazardous waste is conducted by Parts Cleaning Technologies under a separate U.S. EPA identification number (MIK 625 426 333).

Opening Conference

I arrived at the Detrex facility at approximately 8:45 am. I noted that the facility signage indicated Parts Cleaning Technologies (Photograph 1). As I was leaving my vehicle, a gentleman emerged from the building. I presented my enforcement credentials and asked if Detrex was operating at this location. He said that it was, but first asked if I could move my vehicle to the east side of the building so a truck could turn around and exit LeMoyne Avenue.

After relocating my vehicle, I entered the building and was greeted by Liz Cushion in the facility office. I presented my enforcement credentials and explained that I wished to conduct an unannounced hazardous waste inspection that included a visual site inspection (VSI) and then a records review. She said that Rich Fuentes, the gentlemen I had met in front of the building, would accompany me on the VSI, and that she would assist me with the records review. Mr. Fuentes returned to the facility office a few minutes later and we then proceeded to the warehouse.

Visual Site Inspection

As part of the VSI, I inspected the truck dock, the product warehouse, the non-hazardous waste and product storage area, the hazardous waste container storage area and the staging area. I also inspected the exterior of the building on all sides, including the loading dock (Photographs 1 through 6). I noted that the non-hazardous wastes, the products storage area, and the hazardous waste storage areas are all enclosed within the same diked area / secondary containment (Photographs 10 through 12). I noted two tanks in the non-hazardous storage area (Photograph 9). Mr. Fuentes indicated that these tanks were product tanks. I also noted three tanks on the western exterior of the building in secondary containment. Mr. Fuentes also indicated that these tanks were reclamation tanks.

I noted that evacuation plans (Photograph 7), fire extinguishers (Photograph 8), eye washes and spill equipment were present. The floor secondary containment appeared to be in good condition. One container of hazardous waste had its label facing inward, but Mr. Fuentes turned the container so that the label could be read. I noted no other violations or concerns.

During the CEI I took 12 photographs with a Nikon Cool pix digital camera, with 8.1 megapixel resolution. These 12 photographs are attached to this inspection report. They are true and representative of the conditions I observed on the date of the CEI.

Records Review

For the records review portion of the CEI, I returned to the Office. Ms. Cushion directed me to Tom Lisota's (Facility Manager) office where I reviewed records. As part of the records review, I completed the Illinois EPA's RCRA Standardized Permit Inspection Checklist (Checklist) as requested by the Illinois EPA.

As part of the records review I reviewed Detrex's Operating Record, which included: profile sheets for each waste stream; copies of notices to generators; copies of all waste analysis results; manifests; annual reports; land disposal records; logs of manifested waste on hand; inspection forms; and employee training by David Craig for Mr. Lisota (Facility Manager), Liz Cushion (Office Coordinator), Mr. Fuentes (Warehouse & Transportation Manager), Anthony Marino (past warehouseman and truck driver), and Matt Klesken (current warehouseman and truck driver). I noted that Parts Cleaning Technologies also employs a Sales Representative (Jerry Prosser).

During the records review I also reviewed the following documents: Parts Cleaning Technologies' Transporter Contingency Plan; Revised Closure Cost Estimate / Pollution Liability Insurance Checklist; Waste Analysis Plan; Contingency Plan; Closure Plan; Cost Estimate for Closure (dated February 1, 2010); Inspection Schedule; Inspections of Emergency and Safety Equipment; Annual Inspection of Warehouse Area; Lift Truck Inspections; Weekly Inspections; Daily Inspections; and Repair Logs. I also noted that Detrex sends Annual Land Ban and Waste Profile information to each generator on an annual basis asking the generator to recertify.

Closing Conference

As part of the Closing Conference I indicated to Ms. Cushion and Mr. Fuentes that I would send a letter to Detrex / Parts Cleaning Technologies, along with the inspection report, checklist and photographs. I gave Ms. Cushion the U.S. EPA OECA Small Business Information Sheet, the Illinois Sustainable Technology Center Brochure, and the U.S. EPA Region 5 List of Pollution Prevention Contacts. I concluded the CEI at approximately 11:30 AM and departed at approximately 11:45 AM.

ATTACHMENT(S):

Inspection Checklist
Photographs (12)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
	PART 703: RCRA PERMIT PROGRAM	
	SUBPART B: PROHIBITIONS	
	Section 703.121 RCRA Permits	
703.121(a)	Has any person conducted any hazardous waste treatment, hazardous waste storage or hazardous waste disposal operation doing so only: 1) With a RCRA permit? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	2) In conformance with all conditions imposed by a RCRA permit? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.121(a)
703.121(b)	Does the owner and operator of HWM units have permits during the active life of the unit including closure and post-closure periods? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.121(b)
	SUBPART J: STANDARDIZED PERMITS FOR STORAGE AND TREATMENT UNITS	
	Section 703.352 Information that Must Be Kept at the Facility	
	Has the owner or operator kept the following general information at its facility:	
703.352(a)(1)	1) A general description of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(1)
703.352(a)(2)	2) Results of chemical and physical analyses of the hazardous waste and hazardous debris handled at the facility including all the information that the owner or operator must know to treat or store the wastes properly pursuant to the requirements of 35 Ill. Adm. Code 727? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(2)
703.352(a)(3)	3) A copy of the waste analysis plan required by 35 Ill. Adm. Code 727.110(d)(2)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(3)
703.352(a)(4)	4) A description of the security procedures and equipment required by 35 Ill. Adm. Code 727.110(e)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(4)
703.352(a)(5)	5) A copy of the general inspection schedule required by 35 Ill. Adm. Code 727.110(f)(2), including the applicable requirements of 35 Ill. Adm. Code 724.933, 724.952, 724.953, 724.958, 724.988, 727.270(e), and 727.290(d) and (f)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(5)
703.352(a)(6)	6) A justification of any modification of the preparedness and prevention requirements of 35 Ill. Adm. Code 727.130(a) through (f)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(6)
703.352(a)(7)	7) A copy of the contingency plan required by 35 Ill. Adm. Code 727.150? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(7)
703.352(a)(8)	8) A description of procedures, structures, or equipment used at the facility to accomplish each of the following: A) Prevent hazards in unloading operations (for example, use ramps, special forklifts)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) Prevent runoff from hazardous waste handling areas to other areas of the facility or environment, or to prevent flooding (for example, with berms, dikes, trenches, etc.)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> C) Prevent contamination of water supplies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> D) Mitigate effects of equipment failure and power outages? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> E) Prevent undue exposure of personnel to hazardous waste (for example, requiring protective clothing)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> F) Prevent releases to atmosphere? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(8)
703.352(a)(9)	9) A description of precautions to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes as required by 35 Ill. Adm. Code 727.110(h)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(9)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
703.352(a)(10)	10) The traffic pattern, estimated volume (number, types of vehicles) and control (for example, showing turns across traffic lanes, and stacking lanes; describing access road surfacing and load bearing capacity; showing traffic control signals, etc.)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(10)
703.352(a)(12)	12) An outline of both the introductory and continuing training programs used to prepare employees to operate or maintain the facility safely as required by 35 Ill. Adm. Code 727.110(g) and a brief description of how training is designed to meet actual job tasks pursuant to 35 Ill. Adm. Code 727.110(g)(1)(C) requirements? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(12)
703.352(a)(13)	13) A copy of the closure plan required by 35 Ill. Adm. Code 727.210(c) including, where applicable, as part of the plans, specific requirements in 35 Ill. Adm. Code 727.270(g), 727.290(l), and 727.900(i)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(13)
703.352(a)(15)	15) The most recent closure cost estimate for your facility prepared pursuant to 35 Ill. Adm. Code 727.240(c) and a copy of the documentation required to demonstrate financial assurance pursuant to 35 Ill. Adm. Code 727.240(d)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(15)
703.352(a)(17)	17) Where applicable, a copy of the insurance policy or other documentation that complies with the liability requirements of 35 Ill. Adm. Code 727.240(h)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(17)
703.352(a)(18)	18) Where appropriate, proof of coverage by a State financial mechanism, as required by 35 Ill. Adm. Code 727.240(j) or 727.240(k)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(18)
703.352(a)(19)	19) A topographic map showing a distance of 1,000 feet around the facility at a scale of 2.5 centimeters (1 inch) equal to not more than 61.0 meters (200 feet) and showing elevation contours. The contour intervals show the pattern of surface water flow in the vicinity of and from each operational unit of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The map clearly shows each of the following: A) The map scale and date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) Any 100-year flood plain area? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> C) All surface waters including intermittent streams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> D) The surrounding land uses (residential, commercial, agricultural, recreational)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> E) A wind rose (i.e., prevailing windspeed and direction)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> F) The orientation of the map (north arrow)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> G) Legal boundaries of the facility site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> H) Facility access control (fences, gates)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> I) All injection and withdrawal wells both on-site and off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> J) All buildings; treatment, storage, or disposal operations; and other structures (recreation areas, runoff control systems, access and internal roads, storm, sanitary, and process sewerage systems, loading and unloading areas, fire control facilities, etc.)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> K) Barriers for drainage or flood control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> L) The location of operational units within the facility where hazardous waste is (or will be) treated or stored (including equipment cleanup areas)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(a)(19)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
703.352(b)(1)	Has the owner or operator kept the following container information at its facility: 1) A description of the containment system to demonstrate compliance with the container storage area provisions of 35 Ill. Adm. Code 727.270(d) that shows the following information: A) The basic design parameters, dimensions, and materials of construction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) How the design promotes drainage or how containers are kept from contact with standing liquids in the containment system? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> C) The capacity of the containment system relative to the number and volume of containers to be stored? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> D) The provisions for preventing or managing run-on? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> E) How accumulated liquids can be analyzed and removed to prevent overflow? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) For storage areas that store containers holding wastes that do not contain free liquids, a demonstration of compliance with 35 Ill. Adm. Code 727.270(d)(3), including the following: A) Test procedures and results or other documentation or information to show that the wastes do not contain free liquids? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) A description of how the storage area is designed or operated to drain and remove liquids or how containers are kept from contact with standing liquids? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) Sketches, drawings, or data demonstrating compliance with 35 Ill. Adm. Code 727.270(e) (location of buffer zone (15m or 50ft) and containers holding ignitable or reactive wastes) and 35 Ill. Adm. Code 727.270(f)(3) (location of incompatible wastes in relation to each other), where applicable? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) Where incompatible wastes are stored or otherwise managed in containers, a description of the procedures used to ensure compliance with 35 Ill. Adm. Code 727.270(f)(1) and (f)(2), and 35 Ill. Adm. Code 727.110(h)(2) and (h)(3)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 5) Information on air emission control equipment as required by Section 703.352(e)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(b)(1)
703.352(b)(2)		703.352(b)(2)
703.352(b)(3)		703.352(b)(3)
703.352(b)(4)		703.352(b)(4)
703.352(b)(5)		703.352(b)(5)
703.352(c)(1)	Has the owner or operator kept the following tank information at its facility: 1) A written assessment that is reviewed and certified by an independent, qualified, registered professional engineer on the structural integrity and suitability for handling hazardous waste of each tank system, as required pursuant to 35 Ill. Adm. Code 727.290(b) and (c)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) The dimensions and capacity of each tank? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) A description of feed systems, safety cutoff, bypass systems, and pressure controls (e.g., vents)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 4) A diagram of piping, instrumentation, and process flow for each tank system? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 5) A description of materials and equipment used to provide external corrosion protection, as required pursuant to 35 Ill. Adm. Code 727.290(b)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 6) For new tank systems, a detailed description of how the tank systems will be installed in compliance with 35 Ill. Adm. Code 727.290(c) and (e)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 7) Detailed plans and description of how the secondary containment system for each tank system is or will be designed, constructed, and operated to meet the requirements of 35 Ill. Adm. Code 727.290(f) and (g)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 9) A description of controls and practices to prevent spills and overflows, as required pursuant to 35 Ill. Adm. Code 727.290(i)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 10) For tank systems in which ignitable, reactive, or incompatible wastes are to be stored or treated, a description of how operating procedures and tank system and facility design will achieve compliance with the requirements of 35 Ill. Adm. Code 727.290(m) and (n)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	703.352(c)(1)
703.352(c)(2)		703.352(c)(2)
703.352(c)(3)		703.352(c)(3)
703.352(c)(4)		703.352(c)(4)
703.352(c)(5)		703.352(c)(5)
703.352(c)(6)		703.352(c)(6)
703.352(c)(7)		703.352(c)(7)
703.352(c)(9)		703.352(c)(9)
703.352(c)(10)		703.352(c)(10)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
703.352(c)(11)	11) Information on air emission control equipment, as required by Section 703.352(e)? Yes _____ No _____ N/A _____	703.352(c)(11)
703.352(d)(1)	Has the owner or operator kept the following equipment information at its facility for equipment subject to Subpart BB of 35 Ill. Adm. Code 724: N/A 1) For each piece of equipment to which Subpart BB of 35 Ill. Adm. Code 724 applies, the following: A) The equipment identification number and hazardous waste management unit identification? Yes _____ No _____ N/A <input checked="" type="checkbox"/> B) The approximate locations within the facility (e.g., identify the hazardous waste management unit on a facility plot plan)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> C) The type of equipment (e.g., a pump or a pipeline valve)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> D) The percent by weight of total organics in the hazardous waste stream at the equipment? Yes _____ No _____ N/A <input checked="" type="checkbox"/> E) The phase of the hazardous waste at the equipment (e.g., gas or vapor or liquid)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> F) The method of compliance with the standard (e.g., monthly leak detection and repair, or equipped with dual mechanical seals)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	703.352(d)(1)
703.352(d)(2)	2) For a facility that cannot install a closed-vent system and control device to comply with Subpart BB of 35 Ill. Adm. Code 724 on the effective date that the facility becomes subject to the Subpart BB provisions, an implementation schedule as specified in 35 Ill. Adm. Code 724.933(a)(2)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	703.352(d)(2)
703.352(d)(3)	3) Documentation that demonstrates compliance with the equipment standards in 35 Ill. Adm. Code 724.952 and 724.959. This documentation contains the records required pursuant to 35 Ill. Adm. Code 724.964? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	703.352(d)(3)
703.352(d)(4)	4) Documentation to demonstrate compliance with 35 Ill. Adm. Code 724.960, which includes the following information: A) A list of all information references and sources used in preparing the documentation? Yes _____ No _____ N/A <input checked="" type="checkbox"/> B) Records, including the dates, of each compliance test required by 35 Ill. Adm. Code 724.933(j)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> C) A design analysis, specifications, drawings, schematics, and piping and instrumentation diagrams based on the appropriate sections of "APTI Course 415: Course 415: Control of Gaseous Emissions," USEPA publication number EPA 450/2-81-005, incorporated by reference in 35 Ill. Adm. Code 720.111(a) or other engineering texts acceptable to the Agency that present basic control device design information. The design analysis addresses the vent stream characteristics and control device operation parameters, as specified in 35 Ill. Adm. Code 724.935(b)(4)(iii)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> D) A statement signed and dated by the facility owner or operator that certifies that the operating parameters used in the design analysis reasonably represent the conditions that exist when the hazardous waste management unit is operating at the highest load or capacity level reasonable expected to occur? Yes _____ No _____ N/A <input checked="" type="checkbox"/> E) A statement signed and dated by the facility owner or operator that certifies that the control device is designed to operate at an efficiency of 95 weight percent or greater? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	703.352(d)(4)
703.352(e)(1)	Has the owner or operator kept the following air emission control equipment information at the facility for equipment subject to Subpart CC of 35 Ill. Adm. Code 724: 1) Documentation for each floating roof cover installed on a tank subject to 35 Ill. Adm. Code 724.984(d)(1) or (d)(2) that includes information that the owner or operator prepared or the cover manufacturer or vendor provided describing the cover design, and the owner's or operator's certification that the cover meets applicable design specifications listed in 35 Ill. Adm. Code 724.984(e)(1) or (f)(1)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	703.352(e)(1)
703.352(e)(2)	2) Identification of each container area subject to the requirements of Subpart CC of 35 Ill. Adm. Code 724 and the owner's or operator's certification that the requirements of this Subpart J are met? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	703.352(e)(2)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
703.352(e)(3)	<p>3) Documentation for each enclosure used to control air pollutant emissions from tanks or containers pursuant to requirements of 35 Ill. Adm. Code 724.984(d)(5) or 724.986(e)(1)(B). This documentation includes records for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure as specified in appendix B to 40 CFR 52.741 (Procedure T—Criteria for and Verification of a Permanent or Temporary Total Enclosure), incorporated by reference in 35 Ill. Adm. Code 720.111(b)?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	703.352(e)(3)
703.352(e)(5)	<p>5) Documentation for each closed-vent system and control device installed pursuant to the requirements of 35 Ill. Adm. Code 724.987 that includes design and performance information, as specified in Section 703.210(c) and (d)?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	703.352(e)(5)
703.352(e)(6)	<p>6) An emission monitoring plan for both Method 21 in appendix A to 40 CFR part 60 (Determination of Volatile Organic Compound Leaks) and control device monitoring methods. This plan includes the following information: monitoring points, monitoring methods for control devices, monitoring frequency, procedures for documenting exceedences, and procedures for mitigating noncompliances?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	703.352(e)(6)
	<p>PART 727 STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE FACILITIES OPERATING UNDER A RCRA STANDARDIZED PERMIT</p> <p>Section 727.110 General Facility Standards</p>	
727.110(c)	<p>Has the owner or operator obtained a USEPA identification number?</p> <p>Yes <u>✓</u> No _____ N/A _____</p>	727.110(c)
727.110(d)(1)	<p>Waste Analysis Requirements</p> <p>Before it treats or stores any hazardous wastes has the owner or operator obtained a detailed chemical and physical analysis of a representative sample of the wastes containing all the information needed to treat or store the waste to comply with this Part and 35 Ill. Adm. Code 728?</p> <p>Yes <u>✓</u> No _____ N/A _____</p>	727.110(d)(1)
727.110(d)(1)(B)	<p>Note: The facility owner or operator may include data in the analysis that was developed pursuant to 35 Ill. Adm. Code 721 or data published or documented on the hazardous waste or on hazardous waste generated from similar processes.</p> <p>Has the facility owner or operator repeated the analysis as necessary to ensure that it is accurate and up to date when the process or operation generating the hazardous wastes has changed?</p> <p>Yes <u>✓</u> No _____ N/A _____</p>	727.110(d)(1)(B)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.110(d)(2)	<p>Has the facility owner or operator developed and followed a written waste analysis plan that describes the procedures it will follow to comply with subsection (d)(1) of this Section and kept this plan at the facility.</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If the owner or operator receives wastes generated from off-site and is eligible for a RCRA standardized permit, the owner or operator also must have submitted the waste analysis plan with the Notice of Intent.</p> <p>Does the plan must specify all of the following:</p> <p>A) The hazardous waste parameters that the owner or operator will analyze and the rationale for selecting these parameters (that is, how analysis for these parameters will provide sufficient information on the waste's properties to comply with subsection (d)(1) of this Section)?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>B) The test methods the owner or operator will use to test for these parameters?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>C) The sampling method the owner or operator will use to obtain a representative sample of the waste to be analyzed. The owner or operator may obtain a representative sample using either of the following methods:</p> <p>i) One of the sampling methods described in Appendix A of 35 Ill. Adm. Code 721; or</p> <p>ii) An equivalent sampling method?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) How frequently the owner or operator will review or repeat the initial analysis of the waste to ensure that the analysis is accurate and up to date.</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>E) Where applicable, the methods the owner or operator will use to meet the additional waste analysis requirements for specific waste management methods, as specified in 35 Ill. Adm. Code 724.117, 724.934(d), 724.963(d), and 724.983?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Security Requirements</p>	
727.110(e)(1)	<p>Has the facility owner or operator prevented, and minimized the possibility for, livestock and unauthorized people from entering the active portion of its facility?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	727.110(d)(2)
727.110(e)(2)	<p>Does the facility have either of the features listed in subsection (e)(2)(A) of this Section or those listed in subsections (e)(2)(B) and (e)(2)(C) of this Section:</p> <p>A) A 24-hour surveillance system (for example, television monitoring or surveillance by guards or facility personnel) that continuously monitors and controls entry onto the active portion of the facility; or</p> <p>B) An artificial or natural barrier (for example, a fence in good repair or a fence combined with a cliff) that completely surrounds the active portion of the facility; and</p> <p>C) A means to control entry, at all times, through the gates or other entrances to the active portion of the facility (for example, an attendant, television monitors, locked entrance, or controlled roadway access to the facility)?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	727.110(e)(1)
727.110(e)(3)	<p>Has the facility owner or operator posted a sign at each entrance to the active portion of a facility, and at other prominent locations, in sufficient numbers to be seen from any approach to this active portion? Does the sign must bear the legend "Danger—Unauthorized Personnel Keep Out?" Is the legend in English and in any other language predominant in the area surrounding the facility (for example, French or Spanish), and is it legible from a distance of at least 25 feet?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: The owner or operator may use existing signs with a legend other than "Danger—Unauthorized Personnel Keep Out" if the legend on the sign indicates that only authorized personnel are allowed to enter the active portion and entry onto the active portion can be dangerous.</p>	727.110(e)(2)
		727.110(e)(3)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.110(f)(1)	General Inspection Requirements Has the owner or operator inspected its facility for malfunctions and deterioration, operator errors, and discharges that may be causing, or may lead to either of the following conditions: A) A release of hazardous waste constituents to the environment; or B) A threat to human health. The owner or operator must conduct these inspections often enough to identify problems in time to correct them before they result in harm to human health and the environment? <div style="text-align: right;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></div>	727.110(f)(1)
727.110(f)(2)	Has the facility owner or operator developed and followed a written schedule for inspecting, monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards? <div style="text-align: right;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></div> A) Has the owner or operator kept this schedule at the facility. <div style="text-align: right;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></div> B) Does the schedule identify the equipment and devices that the owner or operator will inspect and what problems it will look for, such as malfunctions or deterioration of equipment (for example, inoperative sump pump, leaking fitting, etc.). <div style="text-align: right;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></div> C) The frequency of the owner's or operator's inspections may vary for the items on the schedule. However, the frequency should be based on the rate of deterioration of the equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or any operator error goes undetected between inspections. Are areas subject to spills, such as loading and unloading areas, inspected daily when in use? Does the inspection schedule include the items and frequencies required in Sections 727.270(e), 727.290(d) and (f), 727.900(d) and 35 Ill. Adm. Code 724.933, 724.952, 724.953, 724.958, and 724.983 through 724.989, where applicable? <div style="text-align: right;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></div>	727.110(f)(2)
727.110(f)(3)	Has the facility owner or operator remedied any deterioration or malfunction of equipment or structures that the inspection reveals in time to prevent any environmental or human health hazards? Where hazard is imminent or has already occurred, has the owner or operator taken immediate remedial action? <div style="text-align: right;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></div>	727.110(f)(3)
727.110(f)(4)	Has the facility owner or operator recorded all inspections? Has the owner or operator kept these records for at least three years from the date of inspection? Has the owner or operator included the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions? <div style="text-align: right;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></div>	727.110(f)(4)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.110(g)(1)	Employee Training Have facility personnel successfully completed a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part? Has the facility owner or operator ensured that this program includes all the elements described in the documents that are required pursuant to subsection (g)(4)(C) of this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> A) Has a person trained in hazardous waste management procedures directed this program, and taught facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their employment positions? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) Has the training program been designed to ensure that facility personnel are able to respond effectively to emergencies by including instruction on emergency procedures, emergency equipment, and emergency systems, including all of the following, where applicable: i) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment. ii) Key parameters for automatic waste feed cut-off systems. iii) Communications or alarm systems. iv) Response to fires or explosions. v) Response to ground water contamination incidents. vi) Shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Have facility personnel successfully completed the program required in subsection (g)(1) of this Section within six months after the date of their employment or assignment to a facility or to a new position at a facility, whichever is later? Have employees hired after the effective date of the owner's or operator's RCRA standardized permit not worked in unsupervised positions until they have completed the training requirements of subsection (g)(1) of this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
727.110(g)(2)		727.110(g)(1)
727.110(g)(3)	Have facility personnel taken part in an annual review of the initial training required in subsection (g)(1) of this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	727.110(g)(2)
727.110(g)(4)	Has the facility owner or operator maintained the following documents and records at its facility: A) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) A written job description for each position listed pursuant to subsection (g)(4)(A) of this Section. Does the description include the requisite skill, education, or other qualifications, and duties of employees assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> C) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed pursuant to subsection (g)(4)(A) of this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> D) Records that document that facility personnel have received and completed the training or job experience required pursuant to subsections (g)(1), (g)(2), and (g)(3) of this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	727.110(g)(3)
727.110(g)(5)	Has the facility owner or operator kept training records on current personnel until its facility closes? Has the owner or operator kept training records on former employees for at least three years from the date the employee last worked at its facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	727.110(g)(4)
	Note: Personnel training records may accompany personnel transferred within a company.	727.110(g)(5)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.110(h)(1)	Requirements for Managing Ignitable, Reactive, or Incompatible Wastes Has the facility owner or operator taken precautions to prevent accidental ignition or reaction of ignitable or reactive waste by following these requirements: A) The owner or operator has separated these wastes and protected them from sources of ignition or reaction such as open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (for example, from heat-producing chemical reactions), and radiant heat? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A B) While ignitable or reactive waste is being handled, the owner or operator has confined smoking and open flames to specially designated locations? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A C) "No Smoking" signs have been conspicuously placed wherever there is a hazard from ignitable or reactive waste? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A If it treats or stores ignitable or reactive waste, or mixes incompatible waste or incompatible wastes and other materials, has the owner or operator taken precautions to prevent reactions that do the following: A) Generate extreme heat or pressure, fire or explosions, or violent reactions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A B) Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A C) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A D) Damage the structural integrity of the device or facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A E) Threaten human health and the environment in any similar way? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Has the facility owner or operator documented compliance with subsection (h)(1) or (h)(2) of this Section? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Note: The owner or operator may base this documentation on references to published scientific or engineering literature, data from trial tests (for example bench scale or pilot scale tests), waste analyses (as specified in Section 727.110(d)), or the results of the treatment of similar wastes by similar treatment processes and under similar operating conditions.	727.110(h)(1)
727.110(h)(2)		727.110(h)(2)
727.110(h)(3)		727.110(h)(3)
727.110(i)(2)	Facility Location Standard If an owner's or operator's facility is located within a 100-year flood plain, has it been designed, constructed, operated, and maintained to prevent washout of any hazardous waste by a 100-year flood? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A Note: "100-year flood plain" means any land area that is subject to a one percent or greater chance of flooding in any given year from any source. "Washout" means the movement of hazardous waste from the active portion of the facility as a result of flooding. "100-year flood" means a flood that has a one percent chance of being equaled or exceeded in any given year.	727.110(i)(2)
727.130(b)	Section 727.130 Preparedness and Prevention Has the facility owner or operator designed, constructed, maintained, and operated its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water that could threaten human health and the environment? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	727.130(b)
727.130(c)(1)	Is the facility equipped with all of the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below: 1) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	727.130(c)(1)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.130(c)(2)	2) A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? Yes _____ No _____ N/A _____	727.130(c)(2)
727.130(c)(3)	3) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment? Yes _____ No _____ N/A _____	727.130(c)(3)
727.130(c)(4)	4) Water at adequate volume and pressure to supply water hose streams, or foam-producing equipment, or automatic sprinklers, or water spray systems? Yes _____ No _____ N/A _____	727.130(c)(4)
727.130(d)	Has the facility owner or operator tested and maintained all required facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, as necessary, to assure its proper operation in time of emergency? Yes _____ No _____ N/A _____	727.130(d)
727.130(e)(1)	Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, do all personnel involved in the operation have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless the device is not required pursuant to Section 727.130(c)? Yes _____ No _____ N/A _____	727.130(e)(1)
727.130(e)(2)	If just one employee is on the premises while the facility is operating, does that person have immediate access to a communication device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance, unless the device is not required pursuant to Section 727.130(c)? Yes _____ No _____ N/A _____	727.130(e)(2)
727.130(f)	Has the facility owner or operator maintained enough aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, as appropriate, considering the type of waste being stored or treated? Yes _____ No _____ N/A _____	727.130(f)
727.130(g)(1)	Has the facility owner or operator attempted to make the following arrangements, as appropriate, for the type of waste handled at its facility and the potential need for the services of these organizations: A) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes? Yes _____ No _____ N/A _____ B) Agreements designating primary emergency authority to a specific police and a specific fire department where more than one police and fire department might respond to an emergency, and agreements with any others to provide support to the primary emergency authority? Yes _____ No _____ N/A _____ C) Agreements with State emergency response teams, emergency response contractors, and equipment suppliers? Yes _____ No _____ N/A _____ D) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions, or releases at the facility? Yes _____ No _____ N/A _____	727.130(g)(1)
727.130(g)(2)	If State or local authorities decline to enter into such arrangements, has the facility owner or operator documented the refusal in the operating record? Yes _____ No _____ N/A _____	727.130(g)(2)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.150(b)(1)	Does the facility owner or operator have a contingency plan for its facility. Has the owner or operator designed the plan to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	727.150(b)(1)
727.150(b)(2)	The owner or operator must implement the provisions of the plan immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health and the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	727.150(b)(2)
727.150(c)(1)	Does the facility contingency plan include the following information: A) A description of the actions facility personnel will take to comply with subsections (b) and (g) of this Section in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) A description of all arrangements agreed upon pursuant to Section 727.130(g) by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> C) An up to date list of names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see subsection (f) of this Section). Where more than one person is listed, is one named as primary emergency coordinator and the others listed in the order in which they will assume responsibility as alternates? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> D) A current list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. In addition, has the facility owner or operator included the location and a physical description of each item on the list, and a brief outline of its capabilities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> E) An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. Has the facility owner or operator described signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	727.150(c)(1)
727.150(c)(2)	Note: If the facility owner or operator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan pursuant to federal 40 CFR 112, or some other emergency or contingency plan, the owner or operator needs only to amend that plan to incorporate hazardous waste management provisions that will comply with the requirements of this Part.	
727.150(d)(1)	Has the facility owner or operator maintained a copy of the plan with all revisions at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	727.150(d)(1)
727.150(d)(2)	Has the owner or operator submitted a copy with all revisions to all local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	727.150(d)(2)
727.150(e)	Has the facility owner or operator reviewed, and immediately amended the contingency plan, if necessary, whenever any of the following occurs: 1) The facility permit is revised; 2) The plan fails in an emergency; 3) The owner or operator changes the facility (in its design, construction, operation, maintenance, or other circumstances) in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency; 4) The owner or operator changes the list of emergency coordinators; or 5) The owner or operator changes the list of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	727.150(e)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.150(f)	Is at least one employee either on the facility premises or on call at all times (that is, available to respond to an emergency by reaching the facility within a short period of time) who has the responsibility for coordinating all emergency response measures? Is this emergency coordinator thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout? In addition, does this person have the authority to commit the resources needed to carry out the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	727.150(f)
727.150(g)(1)	Whenever there has been an imminent or actual emergency situation, has the emergency coordinator (or his designee when the emergency coordinator was on call) immediately undertaken the following actions: A) He or she activated internal facility alarm or communication systems, where applicable, to notify all facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> B) He or she notified appropriate State or local agencies with designated response roles if their help is needed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	727.150(g)(1)
727.150(g)(2)	Whenever there has been a release, fire, or explosion, has the emergency coordinator undertaken the following actions: A) He or she immediately identified the character, exact source, amount, and areal extent of any released materials. He or she may have done this by observation or review of facility records or manifests, and, if necessary, by chemical analysis? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> B) He or she assessed possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment considered both direct and indirect effects of the release, fire, or explosion. For example, the assessment considered the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	727.150(g)(2)
727.150(g)(3)	If the emergency coordinator determined that the facility has had a release, fire, or explosion which could threaten a violation of the Act or Board regulations outside the facility, has he or she reported his findings as follows: A) If his or her assessment indicated that evacuation of local areas was advisable, did he or she immediately notify appropriate local authorities. Was he or she available to help appropriate officials decide whether local areas should be evacuated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> B) Did he or she immediately notify either the government official designated as the on-scene coordinator for that geographical area, or the National Response Center (using their 24-hour toll-free number 800-424-8802). Did the report include the following information: i) The name and telephone number of the reporter; ii) The name and address of facility; iii) The time and type of incident (for example, a release or a fire); iv) The name and quantity of materials involved, to the extent known; v) The extent of injuries, if any; and vi) The possible hazards to human health, or the environment outside the facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	727.150(g)(3)
727.150(g)(4)	During an emergency, did the emergency coordinator take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility? Did these measures include, where applicable, stopping processes and operations, collecting and containing release waste, and removing or isolating containers? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	727.150(g)(4)
727.150(g)(5)	If the facility stopped operations in response to a fire, explosion, or release, did the emergency coordinator monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, when appropriate? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	727.150(g)(5)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.150(h)(1)	Immediately after an emergency, did the emergency coordinator provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire, or explosion at the facility? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	727.150(h)(1)
727.150(h)(2)	After an emergency, did the emergency coordinator ensure that the following occurred in the affected areas of the facility: A) No waste that may be incompatible with the released material was treated, stored, or disposed of until cleanup procedures are completed? Yes _____ No _____ N/A <input checked="" type="checkbox"/> B) All emergency equipment listed in the contingency plan was cleaned and fit for its intended use before operations were resumed? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	727.150(h)(2)
727.150(i)(1)	Did the facility owner or operator notify the Agency and other appropriate State and local authorities that the facility is in compliance with Section 727.150(h)(2) before operations were resumed in the affected areas of the facility? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	727.150(i)(1)
727.150(i)(2)	Did the facility owner or operator note the time, date, and details of any incident that required implementing the contingency plan in the operating record? Within 15 days after the incident, did the owner or operator submit a written report on the incident to the Agency? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Did the owner or operator include the following information in the report: A) The name, address, and telephone number of the owner or operator? Yes _____ No _____ N/A _____ B) The name, address, and telephone number of the facility? Yes _____ No _____ N/A _____ C) The date, time, and type of incident (e.g., fire, explosion)? Yes _____ No _____ N/A _____ D) The name and quantity of materials involved? Yes _____ No _____ N/A _____ E) The extent of injuries, if any? Yes _____ No _____ N/A _____ F) An assessment of actual or potential hazards to human health or the environment, where this is applicable? Yes _____ No _____ N/A <input checked="" type="checkbox"/> G) The estimated quantity and disposition of recovered material that resulted from the incident? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	727.150(i)(2)
727.170(b)(1)	Section 727.170 Recordkeeping, Reporting, and Notifying If a facility received hazardous waste accompanied by a manifest, did the owner or operator, or its agent, do each of the following: A) It signed and dated each copy of the manifest to certify that the hazardous waste covered by the manifest was received? Yes <input checked="" type="checkbox"/> No _____ N/A _____ B) It noted any significant discrepancies in the manifest (as defined in Section 727.170(c)(1)) on each copy of the manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____ C) It immediately gave the transporter at least one copy of the signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____ D) Within 30 days after the delivery, it sent a copy of the manifest to the generator? Yes <input checked="" type="checkbox"/> No _____ N/A _____ E) It retained at the facility a copy of each manifest for at least three years from the date of delivery? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.170(b)(1)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
	<p>If a facility received, from a rail or water (bulk shipment) transporter, hazardous waste which was accompanied by a shipping paper containing all the information required on the manifest (excluding the USEPA identification numbers, generator's certification, and signatures), has the owner or operator, or its agent, done each of the following:</p> <p>A) It signed and dated each copy of the manifest or shipping paper (if the manifest has not been received) to certify that the hazardous waste covered by the manifest or shipping paper was received? Yes _____ No _____ N/A _____</p> <p>B) It noted any significant discrepancies (as defined in Section 727.170(c)(1)) in the manifest or shipping paper (if the manifest had not been received) on each copy of the manifest or shipping paper? Yes _____ No _____ N/A _____</p> <p>C) It immediately gave the rail or water (bulk shipment) transporter at least one copy of the manifest or shipping paper (if the manifest had not been received)? Yes _____ No _____ N/A _____</p> <p>D) Within 30 days after the delivery, it sent a copy of the signed and dated manifest to the generator; however, if the manifest had not been received within 30 days after delivery, the owner or operator, or its agent, sent a copy of the shipping paper signed and dated to the generator? Yes _____ No _____ N/A _____</p> <p>E) It retained at the facility a copy of the manifest and shipping paper (if signed in lieu of the manifest at the time of delivery) for at least three years from the date of delivery? Yes _____ No _____ N/A _____</p>	
727.170(b)(2)		727.170(b)(2)
727.170(b)(3)	<p>Whenever a shipment of hazardous waste has been initiated from a facility, has the facility owner or operator must complied with the requirements of 35 Ill. Adm. Code 722? Yes _____ No _____ N/A _____</p>	727.170(b)(3)
727.170(b)(4)	<p>Within three working days of the receipt of a shipment subject to subpart H of 35 Ill. Adm. Code 722 has the owner or operator of the facility provided a copy of the tracking document bearing all required signatures to the notifier, to the Agency, to the Office of Enforcement and Compliance Assurance, Office of Compliance, Enforcement Planning, Targeting and Data Division (2222A), U.S. Environmental Protection Agency, 1200 Pennsylvania Ave., NW., Washington, DC 20460, and to competent authorities of all other concerned countries? Has the original copy of the tracking document been maintained at the facility for at least three years from the date of signature? Yes _____ No _____ N/A _____</p>	727.170(b)(4)
727.170(c)(1)	<p>Note: Manifest discrepancies are differences between the quantity or type of hazardous waste designated on the manifest or shipping paper, and the quantity or type of hazardous waste a facility actually receives. Significant discrepancies in quantity are either of the following:</p> <p>A) For bulk waste, variations greater than 10 percent in weight; or</p> <p>B) For batch waste, any variation in piece count, such as a discrepancy of one drum in a truckload. Significant discrepancies in type are obvious differences that can be discovered by inspection or waste analysis, such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest or shipping paper.</p>	
727.170(c)(2)	<p>Upon discovering a significant discrepancy, has the facility owner or operator attempted to reconcile the discrepancy with the waste generator or transporter (e.g., with telephone conversations)? If the discrepancy was not resolved within 15 days after receiving the waste, has the owner or operator immediately submitted to the Agency a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue? Yes _____ No _____ N/A _____</p>	727.170(c)(2)
727.170(d)(1)	<p>Has the facility owner or operator kept a written operating record at its facility? Yes _____ No _____ N/A _____</p>	727.170(d)(1)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
	<p>Has the facility owner or operator recorded the following information, as it became available, and maintained the operating record until it closed the facility:</p> <p>A) A description and the quantity of each type of hazardous waste generated, and the methods and dates of its storage or treatment at the facility as required by Appendix A of 35 Ill. Adm. Code 724?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>B) The location of each hazardous waste within the facility and the quantity at each location?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>C) Records and results of waste analyses and waste determinations you perform as specified in Section 727.110(d) and (h) and 35 Ill. Adm. Code 724.934, 724.963, 724.983, and 728.107?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) Summary reports and details of all incidents that require you to implement the contingency plan as specified in Section 727.150(i)(2)?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>E) Records and results of inspections as required by Section 727.110(f)(4) (except that the facility owner or operator needs to keep these data for only three years)?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>F) Monitoring, testing or analytical data, and corrective action when required by Section 727.190, Section 727. 290(b), (d), and (f) and 35 Ill. Adm. Code 724.934(c) through (f), 724.935, 724.963(d) through (i), 724.964, 724.986, 724.989, and 724.990?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>G) All closure cost estimates pursuant to Section 727.240(c)?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>H) The facility owner or operator certification, at least annually, that the owner or operator have a program in place to reduce the volume and toxicity of hazardous waste that it generates to the degree that you determine to be economically practicable; and that the proposed method of treatment or storage is that practicable method currently available to the owner or operator that minimizes the present and future threat to human health and the environment?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>I) For an on-site treatment facility, the information contained in the notice (except the manifest number), and the certification and demonstration, if applicable, required by the facility owner or operator pursuant to 35 Ill. Adm. Code 728.107?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>not treatment</i></p> <p>J) For an on-site storage facility, the information in the notice (except the manifest number), and the certification and demonstration, if applicable, required by the facility owner or operator pursuant to 35 Ill. Adm. Code 728.107?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>K) For an off-site treatment facility, a copy of the notice, and the certification and demonstration, if applicable, required by the generator or the facility owner or operator pursuant to 35 Ill. Adm. Code 728.107 or 728.108?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>L) For an off-site storage facility, a copy of the notice, and the certification and demonstration, if applicable, required by the generator or the owner or operator pursuant to 35 Ill. Adm. Code 728.107 or 728.108?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	727.170(d)(2)
727.170(e)	<p>Has the facility owner or operator furnished all records, including plans, required pursuant to this Part upon the request of any officer, employee, or representative of the Agency or USEPA and made them available at all reasonable times for inspection?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: The retention period for all records required pursuant to this Part is extended automatically during the course of any unresolved enforcement action involving the facility or as requested by the Agency.</p>	727.170(e)
727.170(f)(1)	<p>Has the facility owner or operator prepared and submitted a single copy of an annual hazardous waste report to the Agency by March 1 of each year?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	727.170(f)(1)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.170(f)(2)	<p>Has the owner or operator reported the following information to the Agency:</p> <p>A) Releases, fires, and explosions as specified in Section 727.150(i)(2)? Yes _____ No _____ <i>N/A none know</i></p> <p>B) Facility closures specified in Section 727.210(h)? Yes _____ No _____ <i>N/A none know</i></p> <p>C) As otherwise required by Sections 727.270, 727.290, and 727.900 and Subparts AA, BB, and CC of 35 Ill. Adm. Code 724? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	727.170(f)(2)
727.170(g)	<p>Before transferring ownership or operation of a facility during its operating life, has the facility owner or operator notified the new owner or operator in writing of the requirements of this Part and Subpart J of 35 Ill. Adm. Code 703? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	727.170(g)
727.190(l)(1)	<p>Section 727.190 Releases from Solid Waste Management Units</p> <p>Has the facility owner or operator instituted corrective action as necessary to protect human health and the environment for all releases of hazardous waste or constituents from any solid waste management unit at the facility, regardless of the time at which waste was placed in such unit? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	727.190(l)(1)
727.190(l)(3)	<p>Has the facility owner or operator implemented corrective action beyond the facility property boundary, where necessary to protect human health and the environment, unless the owner or operator demonstrated to the satisfaction of the Agency that despite its best efforts, the owner or operator was unable to obtain the necessary permission to undertake such actions? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	727.190(l)(2)
727.210(b)	<p>Has the facility owner or operator closed the storage and treatment units in a manner that fulfills the following conditions:</p> <p>1) It minimized the need for further maintenance? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) It controlled, minimized, or eliminated, to the extent necessary to protect human health and the environment, the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground, to surface waters, or to the atmosphere? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) It met the closure requirements of this Section and the requirements of Sections 727.270(g), 727.290(l), and 727.900(i). If the facility owner or operator determines that, when applicable, the closure requirements of Section 727.290(l) (tanks) or 727.900(i) (containment buildings) cannot be met, then the owner or operator must close the unit in accordance with the requirements that apply to landfills (35 Ill. Adm. Code 724.410). In addition, for the purposes of post-closure and financial responsibility, such a tank system or containment building is then considered to be a landfill, and the owner or operator must apply for a post-closure care permit in accordance with 35 Ill. Adm. Code 702 and 703? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	727.210(b)
727.210(c)(4)(A)	<p>Did the facility owner or operator notify the Agency in writing at least 45 days before the date that it expects to begin final closure of a treatment or storage tank, container storage area, or containment building? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	727.210(c)(4)(A)
727.210(f)	<p>Within 90 days after the final volume of hazardous waste was sent to a unit, has the facility owner or operator treated or removed all hazardous wastes from the unit following the approved closure plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the facility owner or operator completed final closure activities in accordance with the approved closure plan within 180 days after the final volume of hazardous wastes is sent to the unit? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	727.210(f)
727.210(g)	<p>Has the facility owner or operator properly disposed of or decontaminated all contaminated equipment, structures, and soils during the partial and final closure periods? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Note: By removing any hazardous wastes or hazardous constituents during partial and final closure, the owner or operator may have become a generator of hazardous waste and must handle that waste following all applicable requirements of 35 Ill. Adm. Code 722.</p>	727.210(g)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
7210(h)	Within 60 days of the completion of final closure of each unit under a RCRA standardized permit pursuant to Subpart J of 35 Ill. Adm. Code 705, has the facility owner or operator submitted to the Agency, by registered mail, a certification that each hazardous waste management unit or facility, as applicable, has been closed following the specifications in the closure plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	727.210(h)
727.240(c)(1)	Section 727.240 Financial Requirements Does the facility owner or operator have at the facility a detailed written estimate, in current dollars, of the cost of closing the facility in accordance with the requirements in Section 727.210(b) through (f) and applicable closure requirements in Sections 727.270(g), 727.290(l), 727.900(i)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.240(c)(1)
727.240(c)(4)	Has the facility owner or operator kept the following at the facility during the operating life of the facility: the latest closure cost estimate prepared in accordance with subsections (c)(1) and (c)(3) of this Section and, when this estimate has been adjusted in accordance with subsection (c)(2) of this Section, the latest adjusted closure cost estimate? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.240(c)(4)
727.270(b)(1)	Section 727.270 Use and Management of Containers If a container holding hazardous waste is not in good condition (for example, it exhibits severe rusting or apparent structural defects) or if it begins to leak, has the facility owner or operator undertaken either of the following actions: A) It must transfer the hazardous waste from the defective container to a container that is in good condition; or B) It must manage the waste in some other way that complies with the requirements of this Part? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(b)(1)
727.270(b)(2)	To ensure that the ability of the container to contain the waste is not impaired, has the facility owner or operator used a container made of or lined with materials that are compatible and will not react with the hazardous waste to be stored? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(b)(2)
727.270(b)(3)(A)	Has the facility owner or operator always kept containers holding hazardous waste closed during storage, except when it adds or removes waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(b)(3)(A)
727.270(b)(3)(B)	Has the facility owner or operator never opened, handled, or stored a container holding hazardous waste in a manner that may rupture the container or cause it to leak? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(b)(3)(B)
727.270(c)	At least weekly, has the facility owner or operator inspected areas where it stores containers, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(c)
727.270(d)(1)	Has the facility owner or operator designed and operated containment systems for its container storage areas according to the requirements in subsection (d)(2) of this Section, except as otherwise provided by subsection (d)(3) of this Section? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(d)(1)
727.270(d)(2)(A)	Does a base underlie the containers that is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(d)(2)(A)
727.270(d)(2)(B)	Is the base sloped, or the containment system otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(d)(2)(B)
727.270(d)(2)(C)	Does the containment system have sufficient capacity to contain 10 percent of the volume of all containers placed in it, or the volume of the largest container, whichever is greater? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(d)(2)(C)
727.270(d)(2)(D)	Note: This requirement does not apply to containers that do not contain free liquids. Has the owner or operator prevented run-on into the containment system, unless the collection system has sufficient excess capacity to contain the liquid, in addition to that required by subsection (d)(2)(C) of this Section? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(d)(2)(D)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.270(d)(2)(E)	Has the owner or operator removed any spilled or leaked waste and accumulated precipitation from the sump or collection area as promptly as is necessary to prevent overflow of the collection system? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	727.270(d)(2)(E)
727.270(d)(3)	Note: Except as provided in subsection (d)(4) of this Section, the owner or operator does not need a containment system, as defined in subsection (d)(2) of this Section, for storage areas that store containers holding only wastes with no free liquids if the either of the following conditions are fulfilled: A) The storage area is sloped or is otherwise designed and operated to drain and remove liquid resulting from precipitation; or B) The containers are elevated or are otherwise protected from contact with accumulated liquid.	
727.270(d)(4)	Does the facility owner or operator have a containment system defined by subsection (d)(2) of this Section for storage areas that store containers holding F020, F021, F022, F023, F026, and F027 wastes, even if the wastes do not contain free liquids? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	727.270(d)(4)
727.270(e)	Has the facility owner or operator located containers holding ignitable or reactive waste at least 15 meters (50 feet) from its facility property line and followed the general requirements for ignitable or reactive wastes that are specified in Section 727.110(h)(1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(e)
727.270(f)(1)	Has the facility owner or operator not placed incompatible wastes or incompatible wastes and materials (see appendix V to 40 CFR 264, incorporated by reference in 35 Ill. Adm. Code 720.111(b), for examples) in the same container, unless it complies with Section 727.110(h)(2)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(f)(1)
727.270(f)(2)	Has the facility owner or operator not placed hazardous waste in an unwashed container that previously held an incompatible waste or material? Yes <input checked="" type="checkbox"/> No _____ N/A _____	727.270(f)(2)
727.270(f)(3)	Has the facility owner or operator separated storage container holding a hazardous waste that is incompatible with any waste or with other materials stored nearby in other containers, piles, open tanks, or surface impoundments from the other materials, or protect the containers by means of a dike, berm, wall, or other device? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	727.270(f)(3)
727.270(g)	When stopping the use of containers has the facility owner or operator removed all hazardous waste and hazardous waste residues from the containment system and decontaminated or removed remaining containers, liners, bases, and soil containing, or contaminated with, hazardous waste or hazardous waste residues? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	727.270(g)
727.270(h)	Has the facility owner or operator managed all hazardous waste placed in containers according to the requirements of Subparts AA, BB, and CC of 35 Ill. Adm. Code 724? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Note: Under a RCRA standardized permit, the following control devices are permissible: a thermal vapor incinerator, a catalytic vapor incinerator, a flame, a boiler, a process heater, a condenser, or a carbon absorption unit.	727.270(h)
727.290(b)	Section 727.290 Tank Systems Has the owner or operator obtained a written assessment, reviewed and certified by an independent, qualified registered professional engineer, following 35 Ill. Adm. Code 702.126(d), attesting that the tank system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste and includes the information outlined in 35 Ill. Adm. Code 727.290(b)(1) through (b)(4)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	727.290(b)
727.290(e)(3)	Has the facility owner or operator obtained, and kept at the facility, written statements by those persons required to certify the design of the tank system and to supervise the installation of the tank system as required in subsections (c), (d), (e)(1), and (e)(2) of this Section, which attest that the tank system was properly designed and installed and that repairs were made pursuant to subsections (c) and (d) of this Section, including the certification statement as required in 35 Ill. Adm. Code 702.126(d)? Yes _____ No _____ N/A _____	727.290(e)(3)
727.290(f)(1)(A)	Have secondary containment systems been designed, installed, and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	727.290(f)(1)(A)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.290(f)(1)(B)	Are secondary containment systems capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____	727.290(f)(1)(B)
727.290(f)(2)(A)	Have secondary containment systems been constructed of or lined with materials that are compatible with the wastes to be placed in the tank system and have sufficient strength and thickness to prevent failure owing to pressure gradients (including static head and external hydrological forces), physical contact with the waste to which it is exposed, climatic conditions, and the stress of daily operation (including stresses from nearby vehicular traffic)? Yes _____ No _____ N/A _____	727.290(f)(2)(A)
727.290(f)(2)(B)	Have secondary containment systems been placed on a foundation or base capable of providing support to the secondary containment system, resistance to pressure gradients above and below the system, and capable of preventing failure due to settlement, compression, or uplift? Yes _____ No _____ N/A _____	727.290(f)(2)(B)
727.290(f)(2)(C)	Have secondary containment systems been provided with a leak-detection system that is designed and operated so that it will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours? Yes _____ No _____ N/A _____	727.290(f)(2)(C)
727.290(f)(2)(D)	Have secondary containment systems been sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills, or precipitation, and has the facility owner or operator removed spilled or leaked waste and accumulated precipitation from the secondary containment system within 24 hours, or as promptly as possible, to prevent harm to human health and the environment? Yes _____ No _____ N/A _____	727.290(f)(2)(D)
727.290(g)	Does secondary containment consist of a liner external to the tank, a doubled wall tank, or an equivalent device that meets the requirements outlined in subsections (g)(2) and (g)(3) of this Section? Yes _____ No _____ N/A _____	727.290(g)
727.290(h)	Has the facility owner or operator provided ancillary equipment with secondary containment (for example, trench, jacketing, double-walled piping, etc.) that meets the requirements of subsections (f)(1) and (f)(2) of this Section? Yes _____ No _____ N/A _____	727.290(h)
727.290(i)(1)	Has the facility owner or operator not placed hazardous wastes or treatment reagents in a tank system if the substances could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail? Yes _____ No _____ N/A _____	727.290(i)(1)
727.290(i)(2)	Has the facility owner or operator used appropriate controls and practices to prevent spills and overflows from tank or containment systems including the following minimum requirements: A) Spill prevention controls (for example, check valves, dry disconnect couplings, etc.); B) Overfill prevention controls (for example, level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank, etc.); and C) Sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes _____ No _____ N/A _____	727.290(i)(2)
727.290(j)(1)	Has the facility owner or operator developed and followed a schedule and procedure for inspecting overfill controls? Yes _____ No _____ N/A _____	727.290(j)(1)
727.290(j)(2)	Has the facility owner or operator inspected the following at least once each operating day: A) Aboveground portions of the tank system to detect corrosion or releases of waste; B) Data gathered from monitoring and leak detection equipment (for example, pressure or temperature gauges, monitoring wells, etc.) to ensure that the tank system is being operated according to its design; and C) The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system (for example, dikes) to detect erosion or signs of releases of hazardous waste (for example, wet spots, dead vegetation, etc.)? Yes _____ No _____ N/A _____	727.290(j)(2)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.290(j)(3)	<p>Has the facility owner or operator inspected cathodic protection systems, if present, according to, at a minimum, the following schedule to ensure that they are functioning properly:</p> <p>A) It has confirmed that the cathodic protection system is operating properly within six months after initial installation and annually thereafter; and</p> <p>B) It has inspected or tested all sources of impressed current, as appropriate, at least every other month?</p> <p>Yes _____ No _____ N/A _____</p>	727.290(j)(3)
727.290(j)(4)	<p>Has the facility owner or operator documented, in the operating record of the facility, an inspection of those items in subsections (j)(1) through (j)(3) of this Section?</p> <p>Yes _____ No _____ N/A _____</p>	727.290(j)(4)
727.290(k)	<p>If there has been a leak or a spill from a tank system or secondary containment system, or if either system is unfit for use, has the facility owner or operator removed the system from service immediately, and satisfied the requirements in subsections (k)(1) through (k)(6) of this Section?</p> <p>Yes _____ No _____ N/A _____</p>	727.290(k)
727.290(k)(4)	<p>Has the facility owner or operator reported any release to the environment, except as provided in subsection (k)(4)(A) of this Section, to the Agency within 24 hours of its detection, and within 30 days of detection of a release to the environment, submitted a report to the Agency that contains the information listed in subsection (k)(4)(B) of this Section?</p> <p>Yes _____ No _____ N/A _____</p>	727.290(k)(4)
727.290(k)(5)	<p>If there has been a leak or a spill from a tank system or secondary containment system, has the facility owner or operator closed the system or made necessary repairs?</p> <p>Yes _____ No _____ N/A _____</p>	727.290(k)(5)
727.290(l)	<p>When the facility owner or operator closes a tank system, has it removed or decontaminated all waste residues, contaminated containment system components (liners, etc.), contaminated soils, and structures and equipment contaminated with waste, and managed them as hazardous waste, unless 35 Ill. Adm. Code 721.103(d) applies?</p> <p>Yes _____ No _____ N/A _____</p>	727.290(l)
727.290(m)(1)	<p>Has the facility owner or operator not placed ignitable or reactive waste in tank systems, unless any of the three conditions of subsection (m)(1)(A) through (m)(1)(C) of this Section were fulfilled?</p> <p>Yes _____ No _____ N/A _____</p>	727.290(m)(1)
727.290(m)(2)	<p>If the facility owner or operator stored or treated ignitable or reactive waste in a tank, has it complied with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built on, as required in Tables 2-1 through 2-6 of "Flammable and Combustible Liquids Code," NFPA 30, incorporated by reference in 35 Ill. Adm. Code 720.111(a)?</p> <p>Yes _____ No _____ N/A _____</p>	727.290(m)(2)
727.290(n)	<p>Has the facility owner or operator not placed incompatible wastes or incompatible wastes and materials in the same tank system, unless it complies with Section 727.110(h)(2), and not placed hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material, unless it complies with Section 727.110(h)(2)?</p> <p>Yes _____ No _____ N/A _____</p>	727.290(n)
727.290(o)	<p>Has the facility owner or operator managed all hazardous waste placed in a tank following the requirements of Subparts AA, BB, and CC of 35 Ill. Adm. Code 724?</p> <p>Yes _____ No _____ N/A _____</p> <p>Note: Under a RCRA standardized permit, the following control devices are permissible: a thermal vapor incinerator, a catalytic vapor incinerator, a flame, a boiler, a process heater, a condenser, or a carbon absorption unit.</p>	727.290(o)
727.900(b)(1)	<p>Section 727.900 Containment Buildings</p> <p>Is the containment building completely enclosed with a floor, walls, and a roof to prevent exposure to the elements, (e.g., precipitation, wind, runoff), and to assure containment of managed wastes?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(b)(1)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.900(b)(2)	<p>Has the floor and containment walls of the unit, including the secondary containment system, if required pursuant to subsection (d) of this Section, been designed and constructed of manmade materials of sufficient strength and thickness to accomplish the following:</p> <p>A) They have supported themselves, the waste contents, and any personnel and heavy equipment that operates within the unit;</p> <p>B) They have prevented failure due to any of the following causes:</p> <p>i) Pressure gradients, settlement, compression, or uplift;</p> <p>ii) Physical contact with the hazardous wastes to which they are exposed;</p> <p>iii) Climatic conditions;</p> <p>iv) Stresses of daily operation, including the movement of heavy equipment within the unit and contact of such equipment with containment walls; or</p> <p>v) Collapse or other failure?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(b)(2)
727.900(b)(3)	<p>Are all surfaces in contact with hazardous wastes chemically compatible with those wastes?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(b)(3)
727.900(b)(4)	<p>Has the facility owner or operator not placed incompatible hazardous wastes or treatment reagents in the unit or its secondary containment system if they could cause the unit or secondary containment system to leak, corrode, or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(b)(4)
727.900(b)(5)	<p>Does the containment building have a primary barrier designed to withstand the movement of personnel, waste, and handling equipment in the unit during the operating life of the unit and appropriate for the physical and chemical characteristics of the waste to be managed?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(b)(5)
727.900(b)(7)	<p>Has the facility owner or operator inspected and recorded in the facility's operating record, at least once every seven days, data gathered from monitoring equipment and leak detection equipment, as well as the containment building and the area immediately surrounding the containment building to detect signs of releases of hazardous waste?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(b)(7)
727.900(b)(8)	<p>Has the facility owner or operator obtained certification by a qualified registered professional engineer that the containment building design meets the requirements of subsections (b)(1) through (b)(6), (c), and (d) of this Section?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(b)(8)
727.900(c)(1)	<p>Has the facility owner or operator maintained the primary barrier to be free of significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released from the primary barrier?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(c)(1)
727.900(c)(2)	<p>Has the facility owner or operator maintained the level of the stored or treated hazardous waste within the containment walls of the unit so that the height of any containment wall is not exceeded?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(c)(2)
727.900(c)(3)	<p>Has the facility owner or operator taken measures to prevent personnel or equipment used in handling the waste from tracking hazardous waste out of the unit, designated an area to decontaminate equipment, and collected and properly managed any rinsate?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(c)(3)
727.900(c)(4)	<p>Has the facility owner or operator taken measures to control fugitive dust emissions such that any openings (doors, windows, vents, cracks, etc.) exhibit no visible emissions, operated and maintained all associated particulate collection devices (for example, fabric filter, electrostatic precipitator, etc.) with sound air pollution control practices, and effectively maintained this state of no visible emissions at all times during routine operating and maintenance conditions, including when vehicles and personnel are entering and exiting the unit?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(c)(4)
727.900(d)(1)	<p>Has the facility owner or operator included a primary barrier designed and constructed of materials to prevent the migration of hazardous constituents into the barrier (for example, a geomembrane covered by a concrete wear surface)?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(d)(1)

Regulation	RCRA STANDARDIZED PERMIT INSPECTION CHECKLIST	Violation
727.900(d)(2)	<p>Has the facility owner or operator included a liquid collection and removal system to minimize the accumulation of liquid on the primary barrier of the containment building, as follows:</p> <p>A) The primary barrier is sloped to drain liquids to the associated collection system; and</p> <p>B) The facility owner or operator collects and removes liquids and waste to minimize hydraulic head on the containment system at the earliest practicable time?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(d)(2)
727.900(d)(3)	<p>Has the facility owner or operator included a secondary containment system, including a secondary barrier designed and constructed to prevent migration of hazardous constituents into the barrier, and a leak detection system capable of detecting failure of the primary barrier and collecting accumulated hazardous wastes and liquids at the earliest practical time, as specified in 727.900(d)(3)(A) through (d)(3)(C)?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(d)(3)
727.900(f)	<p>For a containment building that contains both areas that have secondary containment and areas that do not have secondary containment, has the facility owner or operator fulfilled the following requirements:</p> <p>1) Designed and operated each area in accordance with the requirements enumerated in subsections (b) through (d) of this Section;</p> <p>2) Taken measures to prevent the release of liquids or wet materials into areas without secondary containment; and</p> <p>3) Maintained in the facility's operating log a written description of the operating procedures used to maintain the integrity of areas without secondary containment?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(f)
727.900(g)	<p>Throughout the active life of the containment building, if the facility owner or operator detected a condition that could lead to or has caused a release of hazardous waste, has it repaired the condition promptly, in accordance with the following procedures:</p> <p>1) Upon detection of a condition that has lead to a release of hazardous waste (for example, upon detection of leakage from the primary barrier), the owner or operator undertook each of the following actions:</p> <p>A) Entered a record of the discovery in the facility operating record;</p> <p>B) Immediately removed the portion of the containment building affected by the condition from service;</p> <p>C) Determined what steps it will need to take to repair the containment building, to remove any leakage from the secondary collection system, and to establish a schedule for accomplishing the cleanup and repairs; and</p> <p>D) Within seven days after the discovery of the condition, notified the Agency of the condition, and within 14 working days, provided a written notice to the Agency with a description of the steps taken to repair the containment building, and the schedule for accomplishing the work.</p> <p>3) Upon completing all repairs and cleanup, the facility owner or operator has notified the Agency in writing and provide a verification, signed by a qualified, registered professional engineer, that the repairs and cleanup have been completed according to the written plan submitted in accordance with subsection (g)(1)(D) of this Section?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(g)
727.900(h)	<p>Note: A containment building can serve as an adequate secondary containment system for tanks placed within the building under both of the following conditions:</p> <p>1) The containment building can serve as an external liner system for a tank if it meets the requirements of Section 727.290(g)(1); and</p> <p>2) The containment building also meets the requirements of Sections 727.290(f)(1), (f)(2)(A), and (f)(2)(B).</p>	
727.900(i)	<p>When the facility owner or operator closed a containment building, has it removed or decontaminated all waste residues, contaminated containment system components (liners, etc.), contaminated subsoils, and structures and equipment contaminated with waste and leachate and managed them as hazardous waste unless 35 Ill. Adm. Code 721.103(d) applies? Do the closure plan, closure activities, cost estimates for closure, and financial responsibility for containment buildings meet all of the requirements specified in Sections 727.210 and 727.240?</p> <p>Yes _____ No _____ N/A _____</p>	727.900(i)

Photographs for Detrex

Media: RCRA

Disk Number 1
Photo Number 1
Photo Filename DSCN1067.JPG
Date/Time 1/10/2011
11:46:10 AM
Photographer Diane Sharrow

Description

Detrex / Parts Cleaning Technologies -
Front Entrance or South Side of Building



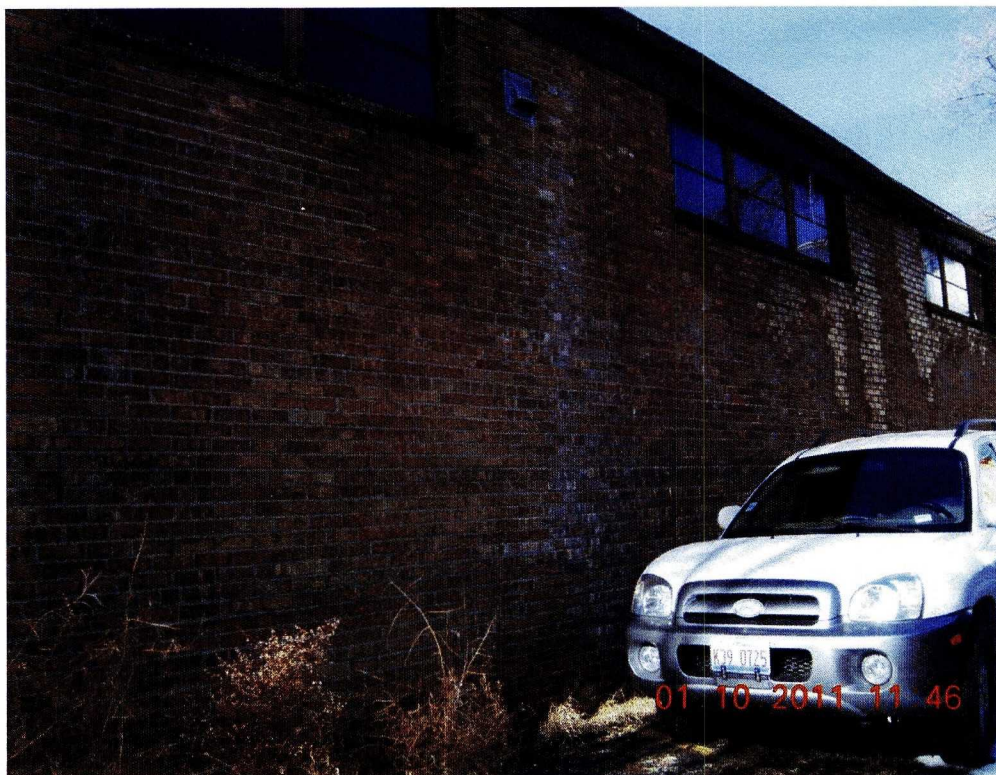
Photographs for Detrex

Media: RCRA

Disk Number 1
Photo Number 2
Photo Filename DSCN1068.JPG
Date/Time 1/10/2011
11:46:52 AM
Photographer Diane Sharrow

Description

Detrex / Parts Cleaning Technologies - East
Side of Building (new loading dock area)



Photographs for Detrex

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN1069.JPG
Date/Time 1/10/2011
11:48:22 AM
Photographer Diane Sharrow

Description

Detrex / Parts Cleaning Technologies - Rear
or North Side of Building



Photographs for Detrex

Media: RCRA

Disk Number 1
Photo Number 4
Photo Filename DSCN1070.JPG
Date/Time 1/10/2011
11:50:30 AM
Photographer Diane Sharrow

Description

Detrex / Parts Cleaning Technologies -
Existing Loading Dock Area



Photographs for Detrex

Media: RCRA

Disk Number 1
Photo Number 5
Photo Filename DSCN1071.JPG
Date/Time 1/10/2011
11:50:40 AM
Photographer Diane Sharrow

Description

Detrex / Parts Cleaning Technologies -
Loading Dock Door South Side of Building



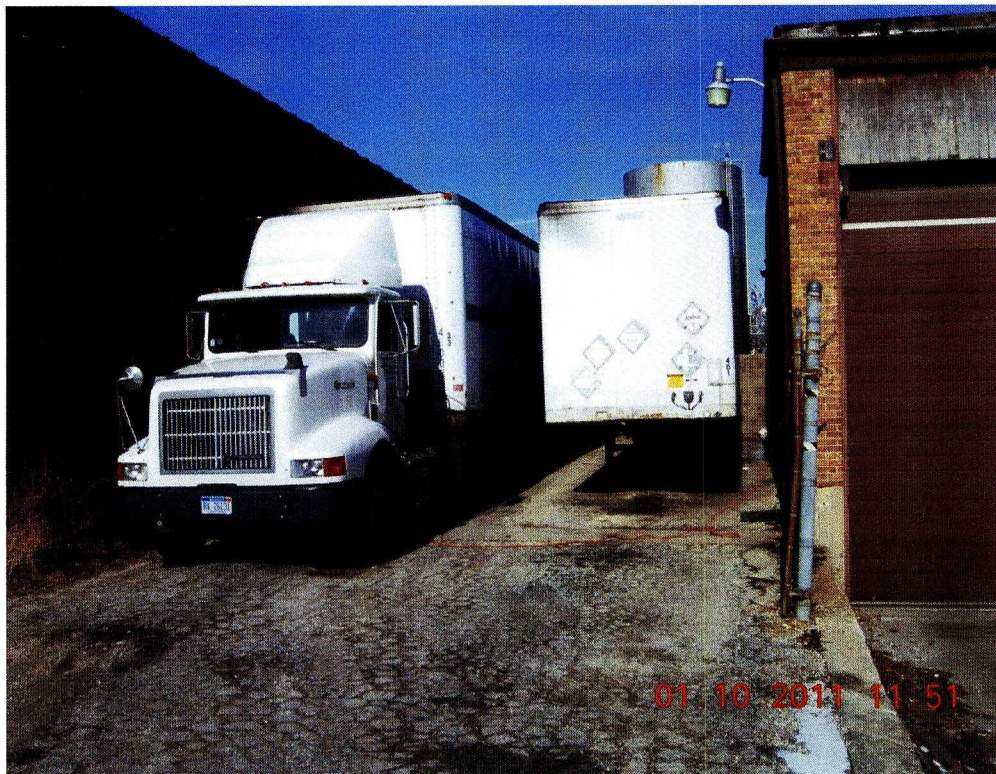
Photographs for Detrex

Media: RCRA

Disk Number 1
Photo Number 6
Photo Filename DSCN1072.JPG
Date/Time 1/10/2011
11:51:00 AM
Photographer Diane Sharrow

Description

Detrex / Parts Cleaning Technologies -
Building Western Exterior



Media: RCRA

Description

A photograph of a wall with several items. On the left, a floor plan diagram of a facility with various rooms and a legend. To its right, a large 'DANGER' sign with the text 'UNAUTHORIZED PERSONNEL KEEP OUT' and 'EMPLOYEES ONLY' at the bottom. Below the floor plan, a handwritten note reads 'TRAILER # 33 FOR'. To the left of this, another note says 'GASTROLEUM'. In the bottom right corner, a digital timestamp displays '01.10.2011 11:51'.

Photographs for Detrex

Media: RCRA

Disk Number 1
Photo Number 8
Photo Filename DSCN1074.JPG
Date/Time 1/10/2011
11:52:32 AM
Photographer Diane Sharrow

Description

Detrex / Parts Cleaning Technologies -
Western Exit



Photographs for Detrex

Media: RCRA

Disk Number 1
Photo Number 9
Photo Filename DSCN1075.JPG
Date/Time 1/10/2011
11:52:50 AM
Photographer Diane Sharrow

Description

Detrex / Parts Cleaning Technologies -
Product Storage Tanks



Photographs for Detrex

Media: RCRA

Disk Number 1
Photo Number 10
Photo Filename DSCN1076.JPG
Date/Time 1/10/2011
11:53:18 AM
Photographer Diane Sharrow

Description

Detrex / Parts Cleaning Technologies -
Hazardous Waste Container Storage



Photographs for Detrex

Media: RCRA

Disk Number 1
Photo Number 11
Photo Filename DSCN1077.JPG
Date/Time 1/10/2011
11:53:38 AM
Photographer Diane Sharrow

Description

Detrex / Parts Cleaning Technologies -
Container Storage



Photographs for Detrex

Media: RCRA

Disk Number 1
Photo Number 12
Photo Filename DSCN1078.JPG
Date/Time 1/10/2011
11:53:56 AM
Photographer Diane Sharrow

Description

Detrex / Parts Cleaning Technologies -
Hazardous Waste Container Storage



ORC ATTORNEY ASSIGNMENT FORM
(Revised February 16, 2000)

RESERVED FOR DATA ANALYST'S USE

DOCKET NUMBER

CASE/MATTER NAME: RCRA Permit Renewal

PROGRAM ASSIGNEE: James Blough, TSP Section, WMB, WPTD ; Phone: 6-2927; Date of Request: 8/02/02

FACILITY NAME: Detrex Corporation, ILD 074 424 938

ADDRESS OR LEGAL DESCRIPTION: 2537 Lemoyne Avenue

CITY: Melrose Park STATE: IL ZIP CODE: 60160 COUNTY: COOK

PRIMARY 4-DIGIT NAICS/SIC CODE: 2869 SECTOR:

OTHER 4-DIGIT NAICS/SIC CODE(s): SECTOR:

PROPOSED RESPONDENTS/PRPs:

ADMINISTRATIVE ENFORCEMENT ☐ JUDICIAL ENFORCEMENT ☐

BID PROTEST ☐ PROTEST NO.

GRANT ASSISTANCE DISPUTE ☐ AGREEMENT NO. AUDIT NO.

PERMIT ☒ DEFENSIVE CASE ☐ APPEALED TO EAB ☐

OTHER COUNSEL MATTER ☐

LAW/SECT. (STATUTE and SECTION which authorize action, e.g. CAA/113(d), CERCLA/106): RCRA Secs. 3004, 3005, 3006, 3008

LAW/SECT. (STATUTE and SECTION violated, or that provides requirement to be enforced, e.g. CAA/112):

POLLUTANTS: Container Storage area for drummed solvent wastes-F001, F002

Is the matter in geographic initiative area? Yes Which one(s)?

Is the matter multi-media?

Is this case a Self Disclosure? If yes, what is the disclosure date:

If this is a Self Disclosure, was the Audit Policy used? ** Was the Small Business Policy applied?

COMMENTS:

Site is likely in an area with EJ concerns (more detailed evaluation underway)
If permit application is adequate, we will look to fast-track the issuance as a courtesy to the State.
We will attempt to have a joint issuance with joint public participation efforts with the State.

ORC ATTORNEY ASSIGNMENT
(Completed by ORC Section Chief)

DATE RECEIVED: 08/02/02

BRANCH: MM Branch I

SECTION: 4/Puchalski

ATTORNEY NAME: Mike Berman

PHONE: 6-6837

DATE ASSIGNED: 8/14/02

PLEASE FORWARD COMPLETED FORM VIA LAN TO CHERYL KLEBENOW (886-6771)- C-14J

Law Offices of
Nicholas M. Spina
AND ASSOCIATES, P.C.
221 North LaSalle • Suite 1653
Chicago, Illinois 60601
236-8743 - 44

Suburban Office
(by appointment only)
6841 W. Cermak Road
Berwyn, Illinois 60402
(708) 788-1211 - 12

FACSIMILIE NO. (312) 236-2750

November 08, 1991

VIA FEDERAL EXPRESS

Ms. Mara McGinnis
Illinois E.P.A.
Government and Community Affairs
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

RECEIVED
NOV 12 1991

**GOVT. & COMMUNITY AFFAIRS
ILLINOIS EPA**

Re: Application of Detrex Corproation

Dear Ms. McGinnis:

Please be advised that the undersigned is the attorney for the Village of Melrose Park and as such this communication shall serve as the position the Village relative to the application of the above-referenced corporation currently pending with the Illinois E.P.A.

The Mayor and the Board of Trustees of the Village of Melrose Park attended a meeting with representatives of the subject corporation relative to a review of the pending application for the contained storage of hazardous waste materials as well as shipment of said hazardous material into the subject corporation's facility located within the Village of Melrose Park.

An accord was reached with the representatives of said corporation, including Messrs. Bill Moore, I.H. Shamiyeh and Daniel C. Anderson as follows:

1. No recycling of any such hazardous waste materials would take place at the corporation's MelrosePark location at 2537 LeMoyne, Melrose Park;
2. Any language or wording in the initial application of Detrex Corporation or the temporary permit issued by the Illinois E.P.A. wherein the word "recycling" is mentioned would be deemed null and void;
3. Detrex would confirm the two above-mentioned conditions in a communication to your agency. As of the date of this communication a letter dated November 5, 1991, has been forwarded to your agency confirming the accord reached by the Village and Detrex.

Ms. Mara McGinnis
Illinois E.P.A.
November 08, 1991

PAGE TWO

In addition, the above-mentioned communication from Detrex would be appended to any final permit issued to Detrex by the Illinois E.P.A.

If you should have any further questions in this regard, please do not hesitate to contact the undersigned.

Sincerely,

Nicholas M. Spina
NICHOLAS M. SPINA

NMS:vg

cc: C. August Taddeo, Mayor/Village of Melrose Park
Detrex Corporation



DETREX CHEMICAL INDUSTRIES, INC.

P.O. BOX 501, DETROIT, MICHIGAN 48232

ADDRESS REPLY TO:

2537 LE MOYNE.

MELROSE PARK, ILLINOIS 60160

AREA CODE 312

345-1981

December 29, 1981

United States E. P. A.
Region V
230 S. Dearborn St.
Chicago, IL. 60604

Attention: Mr. Phil Kaplan
Mail Station 5EWHME

Gentlemen:

In regards to the hazardous waste facility inspection conducted on February 5, 1981, we are now in compliance with all of the noted violations.

We have written and implemented the following:

- 1.) Waste Analysis Plan
- 2.) Inspection Schedule
- 3.) Inspection Log

If you have any further questions regarding this matter please feel free to contact me at any time.

Very truly yours,

DETREX CHEMICAL INDUSTRIES, INC.

Barry A. Roberts

Barry A. Roberts
Branch Manager

*Facility in
Compliance
1/4/81 PK*

MAY 27 1981

SEWHME

Barry Roberts, Branch Manager
Detrex Chemical
2537 Lemoyne
Melrose Park, Illinois 60160

Re: Detrex Chemical
Melrose Park, Illinois
ILD074424938

Dear Mr. Roberts:

A representative of the Illinois Environmental Protection Agency (IEPA) inspected your facility on February 5, 1981. As discussed in a telephone conversation on May 22, 1981, between you and Ralph Feeney of my staff, a copy of the inspection report is forwarded for your information.

If you have any questions concerning this inspection report, please contact Ralph Feeney of the Water & Hazardous Materials Compliance Section at (312) 353-2114.

Very truly yours,

Arnold E. Leder, Chief
Compliance Section
Water & Hazardous Materials
Enforcement Branch

Enclosure

cc: John S. Moore, Manager
Land/Noise Pollution Control Division
Illinois Environmental Protection Agency

bcc: Constantelos/Klepitsch
Stone
Baungartner/Lewis
Feeney
John Evans (IEPA)

20 APR 1989

5HR-12

Mr. Charles U. Guy
Manager of Environmental Compliance
Detrex Corporation
P.O. Box 5111
Southfield, Michigan 48088-5111

Re: Detrex Chemical Industries,
Inc., (Gold Shield Solvents)
ILD 074 424 938

Dear Mr. Guy:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on April 5, 1989. The stated actions appear to adequately address the land disposal restrictions deficiency outlined in our March 17, 1989, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Glen Savage, IEPA, FOS
Harry Chappel, IEPA, CMS
Michael Tepatti, Detrex Corporation

5HR-12:B. RUSSELL:or:3-7925:DISK #2:PC FILENAME:GUY

024/19/89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	BR 4/19/89	P.61 4.20.89	

DETREX CORPORATION

P.O. Box 5111, Southfield, MI 48086-5111



TWX 810-224-4756

TELEPHONE:
(313) 358-5800

April 5, 1989

RECEIVED

APR 12 1989

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section
United States Environmental Protection Agency
Region 5
230 South Dearborn St.
Chicago, IL 60604

Dear Mr. Dimock:

The U.S. EPA Notice of Violation (NOV) dated March 17, 1989, received March 22, 1989, to Michael Tepatti at our Melrose Park hazardous waste facility has been referred to Detrex Corporation's Risk Management Group for reply.

The NOV and accompanying inspection report have been reviewed in detail and we have taken the following steps to insure compliance with 265.50(a)(2)(i) and to provide the U.S. EPA with documentation that corrective action has been taken.

1) All incoming drums of hazardous waste are marked with the date the drum is received at the facility. This accumulation start date marking is placed on the drum before the drum is transferred to the container storage area. Enclosed are photographs of drummed waste in the container storage area showing the accumulation start dates marked with paint and the proper waste label giving drum contents.

2) All drums of hazardous waste are properly labeled and the contents identified at the time the waste is picked up at the generator's site and the label is maintained during the entire time the material is stored at our Melrose Park facility.

We could not find any reference in the inspection report or summary (copies attached) that indicates a violation for "failure to identify contents." Therefore, we believe the date marking measure adopted and the documentation provided satisfactorily address the violation cited. If additional information is required please advise.

Very truly yours,

Charles U. Guy
Manager of Environmental Compliance

CUG/smb

Encl.

INSPECTION SUMMARY

Gold Shield Solvents distributes solvents (1,1,1 trichloroethane, trichloroethylene, perchloroethylene and freon) for degreasing. As a service to their customers, they pick up the spent solvent, store the waste (container storage only) and send it off-site to Gold Shield Solvents in Detroit, MI to be reclaimed.

At the time of the inspection, the following apparent violation was observed:

Some of the containers of restricted hazardous waste were being stored without having the accumulation start dates marked on them.

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

☐ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☐ Yes ☒ No ☐ NA

Some containers were marked with the dates and
some were not.

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

☒ Yes ☐ No

NEW

UPDATE

LAND BAN HW INSPECTIONS - PC DATA ENTRY SHEET: 7/22/88 revision

FACILITY NAME: Cold Shield Solvents ID: IWD 074424938INSPECTION DATE: 1/5/89TYPE OF WASTE: (F001-5) (F020-23, F026-28)
(CAL LIST) (1st THIRD)
(2nd THIRD) (FINAL THIRD)STATE REFERRAL: 3/3/89IN COMPLIANCE: (YES) (NO)
VIOLATION CLASS: (ONE) (TWO)

TYPES OF VIOLATIONS:

< CIRCLE AREAS THAT APPLY >

Inspection was:

(State) (Federal) (Contractor)
(Land Ban Only) (Land Ban and CEI)
(Follow up inspection)(A) Waste Analysis
(C) Certification
(D) Illegal Land Disposal
(L) Dilution in Lieu of Treatment
(M) Manifest
(N) Failure to Submit Notification
(T) Improper Treatment
(W) Improper Waste Classification
(O) Other Container markingACTION TAKEN: (NOV) (3008a) (3008h) (3007)
(CRIM) (DOJ Referral)DATE OF ACTION TAKEN: / / DATE RESPONSE IS DUE: / / DATE RESPONSE REC'D: / /

PENALTIES: IN ACTION - > \$

DATE RET'D TO COMPLY: / /

FINAL AMT - > \$

D AGENCY: (STATE) (U. S. EPA)

CONTACTS: ORC: _____

REB: _____

COMMENTS: _____



HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O.T. SHIPPING NAME WASTE TRICHLOROETHYLENE UN OR NA 1710

GENERATOR INFORMATION:

NAME R. F. MAY Co.

ADDRESS 7140 N. LAWNDALE AVE.

CITY LINCOLNWOOD

STATE IL ZIP 60465

EPA ID NO. 150 005198395

EPA WASTE NO. F002

ID NO. 0311655009

ACCUMULATION START DATE 11-16-88

MANIFEST DOCUMENT NO. 2164114

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

STYLE WM-8

Printed by LABELMASTER, Div. of AMERICAN LABELMARK CO. CHICAGO, IL 60646

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

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PUBLIC SAFETY AUTHORITY, OR THE
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STYLE WM-8

Printed by LABELMASTER, Div. of AMERICAN LABELMARK CO. CHICAGO, IL 60646

17 MAR 1989

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Michael Tepatti
Detrex Chemical Industries, Inc.
(Gold Shield Solvents)
2537 Lemoyne Avenue
Melrose Park, Illinois 60160

Re: Notice of Violation
Detrex Chemical Industries, Inc.
(Gold Shield Solvents)
ILD 074 424 938

Dear Mr. Tepatti:

On January 5, 1989, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 waste solvents became effective on November 8, 1986, (reference 51 Federal Register 40636: revisions to 40 CFR Parts 260-265, 268, and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271). Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271).

With respect to the land disposal restrictions (40 CFR Part 268) section of the inspection, your facility was found to be in violation of the following:

Failure to identify contents and mark dates on all containers entering storage, as required by Section 265.50(a)(2)(i).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violation have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violation may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA-CMS
Glen Savage, IEPA-FOS

2/17/89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	<i>[Signature]</i>	<i>P.C.M.</i> 3-17-89	

Ms. Barbara Russell
P 155 069 619 5HR-12

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, June 1985

Sent to	Mr. Michael Tepatti
Street and No.	2537 Lemoyne Avenue
P.O., State and ZIP Code	Melrose Park, IL 60160
Postage	1.05
Certified Fee	85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 2.80
Postmark or Date	

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery
↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to:

Mr. Michael Tepatti
Detrex Chemical Industries
Inc. (Gold Shield Solvents)
2537 Lemoyne Avenue
Melrose Park, IL 60160

4. Article Number

P155069619

Type of Service:

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED**.

5. Signature — Addressee

X Bill Bast

6. Signature — Agent

X

7. Date of Delivery

3/22

8. Addressee's Address (ONLY if requested and fee paid)

2537 Lemoyne
Melrose Park, IL



GOLD SHIELD SOLVENTS
Division of Detrex Corporation

2537 LeMoyn Ave., Melrose Park, IL 60160

Telephone
(312) 345-3806

March 28, 1988

RECEIVED
MAR 29 1988

United States Environmental
Protection Agency
Region 5
230 S. Dearborn St.
Chicago, IL 60604

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Attention: Mr. Ronald Brown

ILD 074 424 938

Dear Mr. Brown:

On the above date I received your letter (attached), at which time I called you and explained to you that this violation had been resolved.

You told me to send you all correspondence relative to this violation.

Enclosed you will find:

- 1.) A record of our waste (in) & (out)
- 2.) A floorplan of our warehouse
- 3.) A monthly record of waste - that is sent to the Metropolitan Sanitary District.
- 4.) A letter from the Illinois EPA resolving our violation.

Should you need any further information relative to this, please do not hesitate to call me.

GOLD SHIELD SOLVENTS DIVISION
Detrex Corporation

Jeffrey P. Phillips
Branch Manager

JPP/dmc

P 759 199 421

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED

NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to

Mr. Jeffrey Phillips

Street and No.

2537 Lemoyne

P.O. State and ZIP Code

Metrose Park, IL 60160

Postage

\$

73

Certified Fee

75

Special Delivery Fee

Restricted Delivery Fee

Return Receipt showing
to whom and Date Delivered

70

Return Receipt showing to whom,
Date, and Address of Delivery

TOTAL Postage and Fees

2.18

Postmark or Date



S Form 3800, June 1985

R. Brown (5HS-12) 230 S. Dearborn, Chicago, IL 60604

**STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE,
CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES. (see front)**

1. If you want this receipt postmarked, stick the gummed stub to the right of the return address leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier. (no extra charge)
2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

3. Article Addressed to:

Mr. Jeffrey Phillips
Detrex Chemical Industries
2537 Lemoyne
Melrose Park, Illinois 60160

4. Article Number

P 759 199 421

Type of Service:

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee
or agent and DATE DELIVERED.

- ### 5. Signature — Addressee

x ~~X~~ Hook

- 6. Signature — Agent**

X

7. Date of Delivery

livery

8. Addressee's Address (*ONLY if requested and fee paid*)

2537 J. May
Meth. Leu. 60

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE, \$300

RETURN
TO



Print Sender's name, address, and ZIP Code in the space below.

Ronald Brown (5HS-12)

U.S. Environmental Protection Agency

230 S. Dearborn, Chicago, IL 60604



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-12

25 MAR 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jeffrey Phillips
Detrex Chemical Industries
2537 Lemoyne
Melrose Park, Illinois 60160

Re: Notice of Violation
Detrex Chemical Industries
ILD 074 424 938

Dear Mr. Phillips:

On June 16, 1987, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the, above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions on F001-F005 spent solvents. The land disposal restrictions became effective on November 8, 1986, (40 CFR 268, and revisions to 40 CFR 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

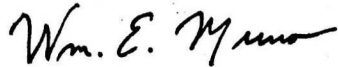
Failure to maintain a complete operating record to include 40 CFR Part 268 requirements in accordance with Section 265.73.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violation has been corrected

and indicating what measures have been initiated to assure future compliance. Failure to correct the violation may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Mr. Ronald Brown of my staff at (312) 886-4463.

Sincerely yours,

A handwritten signature in cursive script, reading "Wm. E. Muno".

William E. Muno, Chief
RCRA Enforcement Branch

Enclosure

cc: Harry Chappel, IEPA
Glenn Savage, IEPA



217/782-6761

Refer to: 0311860003 -- Cook County
Detrex Chemical Industries
ILD074424938
Compliance File

December 10, 1987

87

Detrex Chemical Industries
Attn: Mr. Jeff Phillips, Manager
2537 Lemoyne
Melrose Park, Illinois 60160

Dear Mr. Phillips:

The Agency is in receipt of your response(s) to our October 30, 1987 Pre-Enforcement Conference. Your response(s) has been reviewed and the apparent violation(s) of Section(s) 725.173 is now considered resolved.

If you have any questions, please contact Mr. Rich Finley at 312/345-9780.

Sincerely,

Angela Aye Tin

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

AAT:MS/mls/4502g/52

cc: Division File
Maywood Region
Don Gimbel
Rich Finley
Michael Severns

CONVERSATION RECORD

TIME

11:35

DATE

3-28-88

TYPE

☐ VISIT

☐ CONFERENCE

☒ TELEPHONE

☒ INCOMING

☐ OUTGOING

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Jeffrey Phillips

ORGANIZATION (Office, dept., bureau, etc.)

ILD 074 424 938

Detrex Com.

TELEPHONE NO:

SUBJECT

Land ban NOV (3-25-88)

ROUTING

NAME/SYMBOL

INT

SUMMARY

"Operating record violation has been taken care of."
- Phillips sent new operating record form to
Rick Kinley, the IEPF inspector, who sent a
letter back approving them.

Phillips is to send the forms & Rick Kinley's
approval letter to me. This should take care
of the land ban NOV if it is as Phillips
described it.

ACTION REQUIRED

NAME OF PERSON DOCUMENTING CONVERSATION

Ron Brown

SIGNATURE

Ronald Brown

DATE

3-28-88

ACTION TAKEN

SIGNATURE

TITLE

DATE

9-26-88
F.O.S.

Russell

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Detrex Chemical Industries Inc. (Gold Shield Solvents)

U.S. EPA I.D. No.: ILD 074424938 0311860003

Street: 2537 LeMoigne Ave.

City: Melrose Park State: IL Zip Code: 60160

Telephone: 312/345-3806

Operator: Gold Shield Solvents

Street: 2537 LeMoigne Ave.

City: Melrose Park State: IL Zip Code: 60160

Telephone: 312/345-3806

Owner: Richard LaReno Co.

Street: 1325 Wiley Road - Suite 160

City: Schaumburg State: IL Zip Code: 60195

Telephone: _____

Inspection Date: 1/5/89 Time: 9:00 AM - 11:00 AM Weather Conditions: _____

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>John Maher</u>	<u>IEPA</u>	<u>312/345-9780</u>

Facility Representatives: Michael Tepatti 313/358-5800
Donna Cook 312/345-3806

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>	<u>First Third</u>
Generator	<u>✓</u>	<u>✓</u>	<u>✓</u>	
Transporter	<u>✓</u>	<u>✓</u>	<u>✓</u>	
Treater				
Storer	<u>✓</u>	<u>✓</u>	<u>✓</u>	
Disposer				

RECEIVED
FEB 15 1989
IEPA-DLPC

INSPECTION SUMMARY

Gold Shield Solvents distributes solvents (1,1,1 trichloroethane, trichloroethylene, perchloroethylene and freon) for degreasing. As a service to their customers, they pick up the spent solvent, store the waste (container storage only) and send it off-site to Gold Shield Solvents in Detroit, MI to be reclaimed.

At the time of the inspection, the following apparent violation was observed:

Some of the containers of restricted hazardous waste were being stored without having the accumulation start dates marked on them.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☒ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_____ Yes _____ No X NA

If yes, check the appropriate treatability group.

_____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
 _____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

X Yes _____ No _____ NA

How was this determination made?

- Knowledge of waste

X Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. Waste is spent solvent.

- TCLP

_____ Yes X No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

FOO1 & FOO2 Spent solvents

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

Processes do not change. However, the TSD they send the solvent to sends back an analysis of the waste.

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☒ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☒ NA

Not determined using PFLT. No absorbents added.

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☒ Yes ☐ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. Waste is spent Fuel & Fuel Solvent. Therefore, it exceeds 1000 mg/kg halogens.

- Testing ☐ Yes ☒ No ☐ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

☐ Yes ☐ No ☒ NA No PFLT

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

3. First Third Wastes:

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

☐ Yes ☐ No ☒ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☐ Yes ☐ No ☐ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

☐ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

_____ Yes _____ No _____ NA

- Total Constituent Analysis

_____ Yes _____ No _____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

X Yes _____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

X Yes _____ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

X Yes _____ No

c. Does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ No
 Applicable treatment standards ☒ Yes ☐ No
 Manifest number ☒ Yes ☐ No
 Waste analysis data, if available ☒ Yes ☐ No

Identify off-site treatment or storage facilities: Gold Shield
Solvents site in Detroit, M.I.

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No NA

f. Does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ No
 Applicable treatment standards ☐ Yes ☐ No
 Manifest number ☐ Yes ☐ No
 Waste analysis data, if available ☐ Yes ☐ No
 Certification that the waste meets treatment standards ☐ Yes ☐ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☒ No ☐ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number ☐ Yes ☐ No

The corresponding treatment standards and all applicable prohibitions ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Date the waste is subject to the prohibitions ☐ Yes ☐ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☒ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes

N/A - ~~Yes~~ No soft hammer wastes.

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

☐ Yes ☐ No

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?

☐ Yes ☐ No

Addresses

☐ Yes ☐ No

Telephone Numbers

☐ Yes ☐ No

Contact dates

☐ Yes ☐ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data,
if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes

(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes X No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

☒ Yes ☐ No

If yes, check the appropriate regulatory status:

☒ Interim status for storage

☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

☐ Yes ☒ No

- C. Is the waste treated in an exempt treatment process on-site?

☐ Yes ☒ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent X Yes No NA

o California List X Yes 1 No 0 NA

o First Third Yes No X NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

X Yes _____ No

- a. What date was the waste analysis plan last revised? 11/08/88

- b. Are analyses conducted on-site or off-site?**

On-site:
 X **Fingerprint analysis** **On-site** X **Off-site**

Ashtabula Identify off-site lab: Detrex Corp., Solvents Lab (Redford, MI & Ashtabula, OH).

- c. Is F-solvent waste analyzed using TCLP?**

 Yes ~~X~~ No NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

 Yes No ~~X~~ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: Fingerprint analysis is performed on every shipment.

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

☐ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☐ Yes ☒ No ☐ NA

Some containers were marked with the dates and
some were not.

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

☒ Yes ☐ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes X No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No X NA *No tanks*

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No X NA *No tanks.*

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes X No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes ☒ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes ☒ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

2-26-81

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards

265.

I. General Information:

(A) Facility Name: DETREX Chemical
(B) Street: 2537 Lemoyne
(C) City: Melrose Park (D) State: Ill (E) Zip Code: 60160
(F) Phone: 345-1981 (G) County: Cook

(H) Operator: SAME AS ABOVE
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____

(O) Owner: Detrex Chemical Ind. Inc
(P) Street: P.O. Box 501
(Q) City: DeKalb (R) State: Ala (S) Zip Code: 4232
(T) Phone: 313-358-5800 (U) County: _____

(V) Type of Ownership: _____ Federal _____ Municipal L Private
_____ State _____ County

(W) Date of Inspection: 2-5-81 (X) Time of Inspection (Hr) 9:30AM (Y) 11:30AM

(Z) Weather Conditions: Clear, ~~Hot~~, Cold, 2/10°

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STATE OF ILLINOIS

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MAR 03 1981

WASTE MANAGEMENT BRANCH
EPA REGION IV

1-1

Darryl Roberts

Branch Manager

(2) Inspection Participants

John Evans

Title

C.P.S.

Telephone

345-9780

II. Description of Site Activity

(A) ☐ Generator (Form 2)

(B) ☒ Transporter (Form 3)

(C) ☐ Chemical, Physical
and Biological Treatment (Form 4)

(D) ☒ Storage (Form 5)

(E) ☐ Landfill (Form 6)

(F) ☐ Incineration (Form 7)

(G) ☐ Land Treatment (Form 4)

(H) ☐ Thermal Treatment (Form 7)

(I) Comments: ~~is being~~ All waste coming into site is drummed.

is being ~~is being~~ AND leaves site drummed. Company does

have over packs, in case of leaks, absorbent material.

All material virgin and waste are stored inside the
building. Missing at time of inspection were inspection logs and

Supplemental forms (listed in parenthesis) must be completed for each activity
inspected. Attach all Supplemental forms to this report.

Contingency plan not on file with RD.

Yes

No

Not
Inspected

See Remark
Number

(J) Has this facility
Submitted a Part A
Permit Application?

✓

Advises the Regional Administrator
When notified regarding:

1. Receipt of hazardous
waste from a foreign source?

NA

2. Transfer of Ownership?

1

C) General Waste Analysis:

1. Has the owner^{or} operator obtained
a detailed chemical and
physical analysis of the waste?

V

2. Does the owner^{or} operator have a
detailed waste analysis plan on file
at the facility?

✓

3. Does the waste analysis plan
specify procedures for inspection
and analysis of each movement of
hazardous waste from off-site?

✓

D) Security - Do security measures include:

1. 24-Hour Surveillance?

✓

2. Artificial or Natural
Barrier Around Facility?

✓

3. Controlled Entry?

✓

4. Danger Sign(s) at
Entrance?

✓

E) Do Owner^{or} Operator Inspections
Include:

1. Records of Malfunctions?

NA

2. Records of Operator Error?

✓

3. Records of Discharges?

NA

4. Inspection Schedule?

✓

5. Safety, Emergency Equipment?

✓

6. Security Devices?

✓

Operating and
Structural Devices?

✓

8. Inspection Log?

✓

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment?

✓

2. Is Emergency Equipment Maintained in Operable Conditions?

✓

(D) Has Owner^{or} Operator Provided Immediate Access to Internal Alarms (if needed)?

✓

(E) Is there Adequate Aisle Space for Unobstructed Movement?

✓

(F) Are Arrangements with Local Authorities Included in the Operating Record?

✓

VI. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(A) Does the Contingency Plan Contain the Following Information:

1. The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)

✓

2. Arrangements agreed to by local police departments, fire departments, hospitals, contractor, and State and local emergency response teams to coordinate emergency services pursuant to §264.37?

✓

(E) Do Personnel Training Records Include:

- | | | | | |
|---|----------|-------|-------|-------|
| 1. Job Titles? | <u>✓</u> | _____ | _____ | _____ |
| 2. Description of Training? | <u>✓</u> | _____ | _____ | _____ |
| 3. Records of Training? | <u>✓</u> | _____ | _____ | _____ |
| Is Personnel Training Completed within the Required Time Frame? | <u>✓</u> | _____ | _____ | _____ |

(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed?

- | | | | | |
|--------------------------------|----------|-------|-------|-------|
| 1. Special Handling? | <u>✓</u> | _____ | _____ | _____ |
| 2. No Smoking Signs? | <u>✓</u> | _____ | _____ | _____ |
| 3. Separation and Confinement? | <u>✓</u> | _____ | _____ | _____ |

IV. PREPAREDNESS AND PREVENTION

(A) Maintenance and Operation of Facility:

1. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

_____ ✓ _____

(B) Does the Facility have the Following Equipment:

1. Alarm System?
2. Telephone or 2-Way Radios?
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

_____ ✓ _____

_____ ✓ _____

_____ ✓ _____

Indicate the volume of water and/or foam available for fire control:

Units: _____

Yes

No

Not
InspectedSee Remark
Number

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓_______________

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

_____✓__________

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)

✓_______________

(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations?

✓_______________

(C) Emergency Coordinator

1. Is the facility Emergency Coordinator identified?

✓_______________

2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?

✓_______________

3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

✓_______________

(D) Emergency Procedures

If an Emergency Situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 256.16?

NA_______________

VII. MANIFEST SYSTEM, RECORD KEEPING, AND REPORTING

	Yes	No	Not Inspected	See Remark Number
Use of Manifest System				
1. Does the facility follow the procedures listed in §255.71 for processing each Manifest?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
2. Are records of past shipments retained for 3 years?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §255.73?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §255.74?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

VIII. CLOSURE AND POST CLOSURE

(A) Closure and Post Closure

1. Closure Plan Available for Inspection by May 19, 1981?	<u>X/P</u>	<u> </u>	<u> </u>	<u> </u>
2. Has this plan been submitted to the Regional Administrator?	<u> </u>	<u> </u>	<u> </u>	<u> </u>
3. Has Closure begun?	<u> </u>	<u> </u>	<u> </u>	<u> </u>
4. Is closure cost estimate available by May 19, 1981?	<u> </u>	<u> </u>	<u> </u>	<u> </u>

(B) Post Closure Care and Use of Property
 - Has the Owner/Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?

<u>↓</u>	<u> </u>	<u> </u>	<u> </u>
----------	---------------	---------------	---------------

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 3 - Transporter Inspection

263.

I. General Information:

(A) Transporter Name: Detrex Chemical

(B) Street: 2537 Lemoyne

(C) City: Melrose Park (D) State: Ill (E) Zip Code: 60160

(F) Phone: 345-1781 (G) County: Cook

(H) Operator: SAME AS ABOVE

(I) Street: _____

(J) City: _____ (K) State: _____ (L) Zip Code: _____

(M) Phone: _____ (N) County: _____

(O) Owner: Detrex Chemical Ind. Inc.

(P) Street: P.O. Box 501

(Q) City: Detroit (R) State: Mi. (S) Zip Code: 48232

(T) Phone: 313-358-5800 (U) County: _____

_____ Federal _____ Municipal ☒ Private

(V) Type of Ownership: _____ State _____ County _____

(W) Date of Inspection: 2-5-81 Time of Inspection (From) 9:30AM (To) 10:30AM

(X) Weather Conditions: Clear, Cold, ~10°

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STATE OF ILLINOIS

Person(s) Interviewed

BARRY ROBERTS

Title

Branch Manager

Telephone

345-1981

(Z) Inspection Participants

John Evans

Title

E.P.S.

Telephone

345-9780

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A) ☐ Generator (Form 2)

(B) ☐ Chemical, Physical and
Biological Treatment (Form 4)

(C) ☒ Storage (Form 5)

(D) ☐ Landfill (Form 6)

(E) ☐ Incineration (Form 7)

(F) ☐ Thermal Treatment (Form 7)

(G) Comments: ~~not~~ to Records of inspections, daily log, etc, Emergency
plan not on file with local emergency teams and
no routine waste analysis plan. Problems were
directed to Mr Roberts attention, who stated would be
corrected soon.

Supplemental forms (Listed in Parathesis) must be completed for each activity
inspected. Attach all Supplemental forms to this report.

III. RECORDKEEPING

Yes

No

Not
Inspected

See Remark
Number

(A) Are Copies of the Completed
Manifest(s) or Shipping Paper(s)
Available for Review and
Retained for Three Years?

☒

IV. INTERNATIONAL SHIPMENTS

	Yes	No	Not Inspected	See Remark Number
A. Does the Transporter Record on the Manifest the Date the Waste left U.S.?	<u>NA/</u>	_____	_____	_____
B. Are Completed Manifest(s) on File?	<u>✓</u>	_____	_____	_____

V. MISCELLANEOUS

A. Does Transporter Transport Hazardous Waste Into the U.S. from Abroad?	<u>generator standards</u>	<u>✓</u>	_____	_____
B. Does the Transporter Mix Hazardous Waste of Different DOT Shipping Descriptions, by Placing them into a Single Container?	<u>generator standards</u>	<u>✓</u>	_____	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and Must comply with the Generator Regulations.

VI. PREPARER INFORMATION

A. Name: John Evans
 Title: L.P.S.
 Phone No.: 345-9780

Remarks: _____

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

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I. General Information

(A) Facility Name: DeTex Chemical
(B) Street: 2537 Lemoyne
(C) City: Melrose Park (D) State: Ill (E) ZIP Code: 60160
(F) Date of Inspection: 2-5-81

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart 1)

	YES	NO	NOT IN-SPECTED	REMARKS
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?	✓			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	✓			
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	✓			
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?	✓			

B. Facilities which store hazardous waste in tanks (Subpart 1)

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	NA			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	↓			

Continued on next page

	YES	NO	NOT INSPECTED	REMARKS
3. Do continuous feed systems have a waste feed cutoff?	NA			
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	NA			

C. Facilities which store hazardous waste in surface impoundments (Subpart K)

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?	NA			
2. Do earthen dikes have protective cover?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	NA			

D. Facilities which store hazardous waste in waste piles (Subpart L)

1. Are waste piles covered or protected from the wind?	NA			
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1980.)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	NA			

Continued on next page

	YES	NO	NOT INSPECTED	REMARK #
5. Are piles of reactive or ignitable waste protected?	NA			
Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
7. Are piles of incompatible waste protected by barriers or distance from other waste?	✓			

Site #	EPA HAZARD. WASTE #	Estimated Quantity or Rate (of TSD)	Units of Measure	Process Codes for handling of the waste	Additional Waste Description (if any)
1	F 002	~ 16,500	G	501	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
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